



**Inspiring Primaries  
Academy Trust**

Inspiring all to flourish and succeed



# Safeguarding and Child Protection Policy

Reviewed: July 2026

The Board of Trustees reviewed and adopted this policy on: August 2026

To be reviewed (Annually): July 2027 or earlier if required

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### 1. Scope

This policy applies to all Inspiring Primaries Academy Trust schools.

### 2. Implementation

The new version of this policy must be implemented by 24<sup>th</sup> August 2026, ready to take effect from 1 September 2026.

### 3. Summary of Requirements

Schools are required to amend this template policy, personalising and localising it as indicated. The policy must be approved by the Local Governing Committee and published on the school website.

# CHILD PROTECTION AND SAFEGUARDING POLICY

## INSPIRING PRIMARIES ACADEMY TRUST

Ullesthorpe CE Primary School

August 2026

|                                     |                                   |                            |                                  |
|-------------------------------------|-----------------------------------|----------------------------|----------------------------------|
| Date of last central office review: | August 2026                       | Review Period:             | 1 year (minimum)                 |
| Date of next central office review: | July 2027                         | Owner:                     | Adam Watson                      |
| Date of next school level review:   | July 2027                         |                            |                                  |
| Type of policy:                     | Inspiring Primaries Academy Trust | Trust Board                | Approved template                |
|                                     |                                   | Local Governing Committee: | Approves completed school policy |

|                                                         |             |
|---------------------------------------------------------|-------------|
| The Policy will be reviewed annually, as set out below: |             |
| Policy reviewed centrally                               | AUGUST 2026 |
| Policy tailored by individual schools                   | AUGUST 2026 |
| Policy ratified by Local Governing Bodies               | AUGUST 2026 |
| Policy approved by the Trust Board                      | AUGUST 2026 |
| Implementation of Trust Board                           | AUGUST 2026 |

## KEY EXTERNAL CONTACT DETAILS

|                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Local Authority Designated Officer</b>                                                                                                                                 | Charlotte Davis<br>TEL: 0116 3057750<br>EMAIL: <a href="mailto:charlotte.davis@leics.gov.uk">charlotte.davis@leics.gov.uk</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Local Authority Children's Social Services / LADO</b><br>LADO service is available office hours only:<br>Monday-Thursday 8.30am - 5.00pm<br>and Friday 8.30am - 4.30pm | TEL: 0116 3054141<br>EMAIL: <a href="mailto:CFS-LADO@leics.gov.uk">CFS-LADO@leics.gov.uk</a> emails for referral forms<br>OUT OF HOURS EMERGENCY<br>DUTY TEAM TEL: 0116 305 0005                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Multi-Agency Safeguarding Hub</b><br><b>First Response</b>                                                                                                             | TEL: 0116 305 0005<br>EMAIL: <a href="mailto:childrensduty@leics.gov.uk">childrensduty@leics.gov.uk</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Support and Advice about Extremism</b>                                                                                                                                 | <p><b>Police</b><br/>Leicestershire Police<br/>TEL: 0116 222 2222<br/>EMERGENCY: 999<br/>NON-EMERGENCY NUMBER: 101<br/>ONLINE REPORTING: <a href="http://www.leics.police.uk">www.leics.police.uk</a></p> <p><b>Local Authority</b><br/>Leicestershire &amp; Rutland Safeguarding Partnerships<br/>TEL: 0116 305 7130<br/>EMAIL: contact 0116 305 7130 for further information</p> <p><b>Department for Education</b><br/>NON-EMERGENCY NUMBER: 020 7340 7264<br/>EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a><br/>CONTACT FORM:<br/><a href="https://report-extremism.education.gov.uk/">https://report-extremism.education.gov.uk/</a></p> <p>Anti-terrorist hotline: 0800 789 321</p> |
| <b>NSPCC's what you can do to report abuse dedicated helpline</b>                                                                                                         | TEL: 0808 800 5000<br>EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Disclosure and Barring Service</b>                                                                                                                                     | <p><b>Disclosure Service</b><br/>ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom<br/>TEL: 03000 200 190<br/>EMAIL: <a href="mailto:customerservices@dbb.gov.uk">customerservices@dbb.gov.uk</a></p> <p><b>Barring Service</b><br/>ADDRESS: DBS customer services, PO Box 3961, Royal Wootton Bassett, SN4 4HF, United Kingdom<br/>TEL: 03000 200 190</p>                                                                                                                                                                                                                                                                                                                                          |
| <b>Teaching Regulation Agency</b>                                                                                                                                         | TEL: 0207 593 5393<br>EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>OFSTED (Concerns)</b>                                                                                                                                                  | TEL: 0300 123 4666                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

## KEY SCHOOL CONTACT DETAILS

|                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Inspiring Primaries Academy Trust (IPAT)</b>                                          | <b>Chief Executive Officer of Inspiring Primaries Academy Trust</b><br>Mr Adam Watson<br>EMAIL: <a href="mailto:a.watson@ipat.uk">a.watson@ipat.uk</a><br><br><b>Head of Safeguarding (Service Level Agreement)</b><br>Sara Bryson<br>EMAIL: <a href="mailto:sbryson@learnat.uk">sbryson@learnat.uk</a>                                                                                                                                  |
| <b>Local Governing Committee (LGC)</b>                                                   | <b>Chair of LGC</b><br>Roger Stoney<br>EMAIL: <a href="mailto:r.stoney@ipat.uk">r.stoney@ipat.uk</a><br><br><b>Nominated Safeguarding Governor of LGC</b><br>Katy Bonser & Carly Allan<br>EMAIL: <a href="mailto:k.bonser@ipat.uk">k.bonser@ipat.uk</a> / <a href="mailto:c.allan@ipat.uk">c.allan@ipat.uk</a>                                                                                                                           |
| <b>Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads (DDSLs)</b> | <b>Main DSL for the School</b><br>Jodie Allen<br>TEL: 01455 209926<br>EMAIL: <a href="mailto:dslullesthorne@ipat.uk">dslullesthorne@ipat.uk</a><br><br><b>Deputy DSL</b><br>Chris Gray<br>TEL: 01455 209926<br>EMAIL: <a href="mailto:dslullesthorne@ipat.uk">dslullesthorne@ipat.uk</a><br><br><b>Deputy DSL</b><br>Caroline McMurran<br>TEL: 01455 209926<br>EMAIL: <a href="mailto:dslullesthorne@ipat.uk">dslullesthorne@ipat.uk</a> |
| <b>Designated Teachers for Looked After Children</b>                                     | Jodie Allen<br>TEL: 01455 209926<br>EMAIL: <a href="mailto:ullesthorne@ipat.uk">ullesthorne@ipat.uk</a>                                                                                                                                                                                                                                                                                                                                  |
| <b>Head of School</b>                                                                    | Jodie Allen<br>TEL: 01455 209926<br>EMAIL: <a href="mailto:ullesthorne@ipat.uk">ullesthorne@ipat.uk</a>                                                                                                                                                                                                                                                                                                                                  |

## SCOPE

This policy applies to **Ullesthorpe CE Primary School** ("the school") Inspiring Primaries Academy Trust requires the School's Local Governing Committee to review and update this policy annually (as a minimum). This policy is available **on the school website**. This policy is ratified annually by the Inspiring Primaries Academy Trust Board.

This policy has regard to the following guidance and advice, as amended from time to time (and any supplemental guidance/advice referred to therein):

- Keeping Children Safe in Education (DfE, 2026)
- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, 2015)
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (Updated 2024)
- Mental Health and Behaviour in Schools (DfE, November 2018)
- Preventing and Tackling Bullying (DfE, July 2017)
- Working Together to Safeguard Children (DfE, 2026)
- Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004
- Revised Prevent Duty Guidance: for England and Wales (Home Office, March 2024)
- Data (Use and Access) Act 2025 (effective from January 2026)
- Sexual Offences Act 2003
- Crime and Policing Act 2026
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Relationships education, relationships and sex education (RSE) and health education (DfE, July 2025)
- Early Years Foundation Stage Statutory Framework for Group and School-based Providers (DfE, July 2026, effective 1 September 2026)
- Equality Act (2010)
- The Human Rights Act (1998)
- Modern Slavery: Home Office Statutory Guidance
- The Education (Independent School Standards)) Regulations 2014
- The Public Sector Equality Duty

This policy also takes into account the procedures and practice of Leicestershire County Council and the published safeguarding arrangements set out by the Leicestershire and Rutland Safeguarding Children Partnership safeguarding partners. Further information can be found on the [LRSB website](#); alternatively a copy of their Procedures Manual can be found [here](#). The Local Governing Committee and their senior leadership teams, especially their designated safeguarding leads, will:

- make themselves aware of and follow their local arrangements (including the local criteria for action and the local protocol for assessment);
- ensure this is reflected in their own policies and procedures;
- supply information as requested by the three safeguarding partners;

- work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

## POLICY STATEMENT

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners must make sure their approach is child centred. This means that they should consider, at all times, what is in the **best interests** of the child. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

The school will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Staff working with children should have an attitude of **'it could happen here'** and if there are no reports in their school it does not mean it is not happening. Ultimately, all systems, processes and policies must operate with the best interests of the child at their heart. Where there is a safeguarding concern, the school will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback.

## CONCERNS ABOUT A CHILD

The school always has a duty to consider the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The school has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements are:

All children can speak to any member of staff about any concerns they have at any time. All staff are trained in safeguarding and know what to do with the information depending on what it is. Urgent information will be passed onto the DSL or DDSL immediately in person or over the phone. Less urgent safeguarding concerns are emailed through CPOMS (which goes to all members of the safeguarding team) and are then followed up by a member of the team. If in doubt, members of staff will speak directly to the DSL or DDSL and seek further clarification and advice. Children are informed of this arrangement constantly throughout the school year in both class sessions and assemblies. Posters in all areas of the school show the photographs of all members of the safeguarding team.

Staff must expect to support social workers and other agencies following any referral.

### Definitions of safeguarding, abuse, neglect and exploitation

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment,

whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse, exploit, or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, by other children, or, more rarely, by others (e.g. via the internet).

Technology is a significant component in many safeguarding and well-being issues. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. In many cases abuse will take place concurrently via online channels and in daily life. They may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Abuse and exploitation can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

All staff must be aware of indicators of abuse, neglect and exploitation. Staff are referred to **Appendix 1** of this policy for further detail of the types of abuse and possible signs of abuse. Staff must always be vigilant and raise any concerns with the DSL or DDSL.

**All** staff must have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse;
- unexplainable and/or persistent absences from education;
- serious violence, criminal exploitation (including that linked to county lines), radicalisation, and;
- consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos.

## PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

All staff must be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This must not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

If staff suspect or hear an allegation or concern of abuse, neglect or exploitation from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully;
- avoid asking leading questions;

- reassure the individual that the allegation/complaint will be taken seriously;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff must explain next steps and who the information will be passed to;
- a victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

**All** concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing. Information must be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records must include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome

All Inspiring Primaries Academy Trust schools use CPOMS for recording all incidents. The record includes the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where a report includes online elements or the sharing of images, staff are reminded not to view or forward any illegal images of a child but note what has been reported. Further guidance can be found in the [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

Where there is a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide.

This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. The school manages this by referring them to the safeguarding team. The team of experienced staff including a safeguarding champion are able to offer various forms of support to students and their families. This support may include one-to-one sessions, counselling, group sessions, 'down-time', specific support/work around an issue, external support worker visits, referrals to external support services etc... Wherever possible these referrals and support networks will be extended to siblings / families.

The safeguarding team works hand-in-hand with the SEN team and students may be referred to other services to support their mental health needs as and when appropriate safeguarding information will often be special category personal data and the school will have due regard to its data protection obligations when sharing such data.

### **Information sharing:**

Safeguarding information will often be special category personal data, and the school will comply with data protection law and have due regard to the Department for Education's statutory guidance - Information Sharing Duty (DfE, 2026) - s16LA of the Children Act 2004 and the relevant provisions of KCSIE when sharing such data. Personal information may be shared by the school with a third party (such as the police or local authority) without consent if there is a lawful basis to do so such as where doing so is in order to promote a child's welfare or where

their safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent in certain circumstances. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The school operates its processes with the best interests of the student at its heart.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The school will ensure relevant staff comply with the relevant data protection principles when processing and sharing personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. As part of this, the school will ensure that members of staff:

- Are confident of the processing conditions which allow them to process and share information for safeguarding purposes, including information which is 'special category personal data'.
- Understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent in certain circumstances.
- Do not provide students' personal data where the sharing does not comply with data protection law.

When sharing information staff will ensure they comply with group data protection policies and keep records of disclosures as required by these policies. These are available to staff via [Inspiring Primaries Academy Trust Policies Page](#). For further information about how the school processes pupil personal data, please see the [privacy notice](#) on the website.

### **What staff should do if they have concerns about a child**

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they must act immediately and must speak with the School's DSL or DDSL. If, in exceptional circumstances, the DSL or DDSL is not available, this must not delay appropriate action being taken and staff must consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken must be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the school's local safeguarding partners. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- undertaking a family help assessment; or
- making a referral for statutory services and / or
- making a referral to the police.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff must not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They must be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children's social care (such as on a child in need or child protection plan). Staff must challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing (in line with this policy).

### Support before statutory intervention

Any child may benefit from support before statutory intervention including from universal services and community-based Early Help, or the targeted early help level of Family Help. All staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

Children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse;
- unexplainable and/or persistent absences from education;
- serious violence, criminal exploitation (including that linked to county lines), radicalisation, and;
- consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos.

### **What staff must do if a child is suffering, or is likely to suffer from harm**

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to local authority's children's social care (and the Police if appropriate) is made in accordance with the local authority referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they must inform the DSL as soon as possible that a referral has been made. Children's social care assessments must consider where children are being harmed in contexts outside the home, so it is important to provide as much information as possible as part of the referral process, to enable a contextual approach (see further below re Contextual Safeguarding).

The school's local safeguarding partners are Leicestershire and Rutland Safeguarding Children Partnership, and the locally agreed safeguarding arrangements can be found [here](#).

### **What staff must do if a child is seen as at risk of radicalisation**

Staff must follow the school's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or follow the local procedure found [here](#). Advice and support can also be sought from children's social care.

The school, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL or DDSL and governors responsible for safeguarding to ensure the school's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

See further below for more information on radicalisation. Further guidance can be found in the [Prevent duty guidance: for England and Wales April 2023](#).

### **What staff must do if they discover an act of Female Genital Mutilation ('FGM')**

All staff must speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a specific legal duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to [Appendix 1](#) of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

### **What staff must do if a child goes Missing from Education/Children Absent from Education**

Children missing/absent from education (CME), particularly repeatedly and/or for prolonged periods, and children missing education (unexplainable and/or persistent absences from

education) can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing education procedures. The school's procedures for unauthorised absence and for dealing with children who go missing/absent from education can be found [here](#). Further detail can also be found at [Appendix 1](#) of this policy.

The school will report to the local authority a student who fails to attend school regularly or has been absent from school without the school's permission for a continuous period of 10 school days or more.

### **Elective Home Education**

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommended in statutory guidance that schools and other key professionals work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

### **Risk Assessments and Safety Plans**

Assessing and managing safeguarding risks to/for children involves identifying vulnerabilities and risks, evaluating the likelihood and impact of harm, and putting proportionate measures in place via a written risk assessment or safety plan. Schools must ensure that a written risk assessment and/or safety plan is put in place promptly where there is a risk of significant harm, or where needs escalate beyond what can be safely managed without such a coordinated approach. Such situations may be identified by staff through (not exhaustive):

- Clear disclosures or evidence of harm.
- Escalating patterns of concern (e.g. behaviour, attendance, emotional wellbeing).
- Complex or cumulative vulnerabilities.
- Periods of transition or reintegration following crisis.
- Multi-agency involvement requiring coordinated risk management.

Examples of when such an approach may be needed include (not exhaustive):

- A pupil moving from low mood to expressing hopelessness, and then to suicidal thoughts/ideation.
- An incident/pattern of self-harm (assessing both the severity and frequency).
- Behaviour escalating from verbal conflict to intimidation or threats, and serious risk of physical violence to others.
- An incident/pattern of sexual harassment and/or sexual violence towards children and/or staff.
- A pupil becoming increasingly isolated or targeted, raising concerns about exploitation, bullying, or child-on-child abuse.

- Return to school following a significant incident or external intervention (e.g. hospitalisation, police involvement, social care intervention) where risks remain.

When the school identifies such a potential risk of significant harm, they will:

- Contact the Inspiring Primaries Academy Trust Head of Safeguarding for advice and support.
- Work with the family to create a written risk assessment management plan/safety plan.
- Ensure the plan is clear, proportionate and specific, identifying:
  - o the nature of the risk,
  - o known triggers or warning signs,
  - o protective factors,
  - o agreed strategies to reduce risk,
  - o roles and responsibilities of staff,
  - o actions to take if risk escalates;
- Use a local/reliable, sourced template document (schools are encouraged to use local resources, if possible, if they do not have access to an appropriate document there are template documents available via the Head of Safeguarding).
- Seek the views of relevant agencies (with parental/carer permission), where appropriate.
- Ensure the child's voice is central to the plan, where appropriate.
- Share the plan with relevant staff on a need-to-know basis to ensure consistent implementation.
- Review the plan regularly, with frequency determined by the level of risk, and update it dynamically as circumstances change.

Oversight of high-risk plans must sit with the **DSL/DDSL/SMHL**, with senior leaders assured that plans are understood, implemented consistently and effective in reducing risk.

#### **What staff must do if they have concerns about another staff member (including supply staff, trainee teachers, volunteers and contractors)**

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this must be referred to the Head of School, who will consider whether an onward referral to the LADO is required. Where there are concerns/allegations about the Head of School, this must be referred to the Chair of the Trust Board. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, trainee teachers, volunteers and contractors).

#### **What staff must do if they have concerns about safeguarding practices in the school**

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these must be raised in accordance with the school's whistleblowing procedures which can be found on the Trust policy portal. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT)

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between two or more children and within children's relationships (both intimate and non-intimate). All staff working with children are advised to maintain an attitude of "it could happen here". Staff must recognise that even if there are no reports, it does not mean that child-on-child abuse is not happening, it may be the case that it is just not being reported

This is most likely to include, but may not be limited to:

- Abuse in intimate personal relationships between children;
- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- serious physical assault and harm, or the threat of harm with a weapon,
- Sexual violence, such as rape assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, jokes and online sexual harassment, or misogynistic / misandrist messages which may be stand alone or part of a broader pattern of abuse;
- consensual and non-consensual making or sharing of nudes and semi-nudes;
- The non-consensual sharing of indecent images\*, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it (see further below);
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

**\*Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.**

Child-on-child abuse can be associated with factors outside the school and can occur online and face-to-face between two or more children of any age or gender. The school therefore takes a contextual safeguarding approach to managing child-on-child abuse.

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. The school takes a zero-tolerance approach to abuse, and it must never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

It is recognised that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse is preventable. The school takes a zero-tolerance approach. It must never be passed off or dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys". The school takes the following steps to minimise the risk of child-on-child abuse. Staff report all incidents to the teacher or a senior leader to be dealt with. Disclosures are taken seriously and the victim is spoken to in the first instance to establish the nature of the abuse and who is involved. The incident is dealt with and actions follow.

All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual. Consensual image sharing, especially between older children of the same age, may require a different response. Whilst not abusive, children still need to know it is illegal, whilst non-consensual sharing is illegal and abusive. The school's approach to pupil's sharing nudes and semi-nude's images and or videos is underpinned by a safeguarding first response, recognising such incidents as a potential indicator of vulnerability, exploitation or abuse. All incidents are responded to promptly and proportionately, with appropriate support for pupils, consideration of the circumstances and risks, referrals will be made to relevant agencies where required.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff must follow the procedures below rather than the School's Anti-Bullying and Behaviour policies in the first instance:

The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection. HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online, face-to-face (both physically and verbally), or both and is never acceptable and should always be considered within a child protection context.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage.

For detailed information on what sexual violence and sexual harassment constitutes, important context to be aware of, related legal responsibilities for schools, advice on a whole school approach to preventing child-on-child sexual violence and sexual harassment and more detailed advice on responding to reports see the Department for Education's statutory guidance:

[\*Keeping Children Safe in Education \(2026\), Part 5 – Child-on-child sexual violence and sexual harassment.\*](#)

### **Responding to a report of HSB, sexual harassment and/or sexual violence**

The school's initial response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online must not be downplayed and must be treated seriously. All staff must be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim must never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor must a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this must be explained in such a way that avoids alarming or distressing them.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they must act on them immediately rather than wait to be told.

All staff are trained to manage a report. Effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy);
- careful handling and management of reports that include an online element, including an awareness of guidance on searching screening and confiscation and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. Staff must not view or forward illegal images of a child. The above advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or a deputy) or local authority children's social care) to discuss next steps. Staff must only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be anyone within the school staff. Staff must recognise the significance of being chosen as a confidant and respond with empathy;
- recognising that an initial disclosure may not reflect the full extent of abuse, and that trauma can impact memory meaning details may be affected;
- keeping in mind that certain children may face additional barriers to disclosure especially for children with vulnerabilities related to disability, sex, ethnicity, or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, avoiding judgement, being clear about boundaries and how the report will be progressed, and asking only open-ended questions - such as where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to record the report. Ideally, staff must wait until the end of the conversation to write a detailed summary, allowing the staff member to give the child their full attention. If notes are taken during the report, especially when a second staff member is present, care must be taken to remain engaged and not appear distracted. **It is essential a written record is made;**

- record only what the child says, without interpretation or personal opinion. These notes may be used in statutory assessments and/or criminal investigations, and
- if the designated safeguarding lead (or a deputy), is not present during the report, they must be informed as soon as practically possible.

The school recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL will discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by DSL/DDSL and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities or certain health conditions can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children.

The school will take advice from relevant local safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the relevant local safeguarding partners, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the relevant local safeguarding partners, such as children's social care and/ or the Police as appropriate.

Consideration of safeguarding all those children involved in the safeguarding report will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. Important considerations will include:

- the victim's wishes regarding how they want to proceed. Victims must be given as much control as reasonably possible regarding how an investigation will be progressed and what support they are offered, balanced against the school's duty to protect others,
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB was displayed,
- the ages and developmental stages of the children involved,

- any power imbalance between the children such as differences in age, maturity, or social status. Consider if the victim has a disability or learning difficulty,
- whether the alleged incident was isolated or part of a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature),
- that sexual violence and sexual harassment can take place within intimate relationships between children,
- importance of understanding intrafamilial harm and support for siblings if needed,
- any ongoing risks to the victim, other children, adult students or school staff, and
- wider contextual concerns, including links to child sexual exploitation (CSE) or child criminal exploitation (CCE).

The DSL (or a deputy DSL) will make an immediate risk and needs assessment in respect of each child affected. (Where there has been a report of sexual harassment, the need for a risk and needs assessment must be considered on a case-by-case basis). The risk and needs assessment must consider:

- the “victim”;
- the alleged “perpetrator”; and
- the other children (and, if appropriate, staff) at the school.

The DSL will consider as part of the school’s response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all students and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the “victim” and alleged “perpetrator” and considerations regarding shared classes, sharing school premises and school transport. Any professional risk assessment will inform the school’s approach.

The police will be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. A report to the police will generally be made in parallel with a referral to children’s social care.

If the DSL decides to make a referral to children’s social care and/or a report to the police against a “victim’s” wishes, the reasons must be explained to the student and appropriate specialist support offered. The DSL or DDSL will also work closely with children’s social care and other agencies are required to ensure any action taken under this policy does not jeopardise any statutory investigation and to discuss how the alleged “perpetrator”, staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and children’s social care to ensure the welfare and safety of all children and update the risk assessments and ensure relevant protections and measures are in place for all children.

The school will consider whether disciplinary action may be appropriate for any child/children involved. Before deciding on appropriate action, the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child’s behaviour; any unmet

needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school recognises that good record-keeping and monitoring of sexual violence and sexual harassment reports is essential and assists the school in meeting its Public Sector Equality Duty.

## SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, TRAINEE TEACHERS, VOLUNTEERS AND CONTRACTORS

The school's procedures for managing concerns/ allegations against staff who are currently working in the school follows Department for Education statutory guidance and local safeguarding partners' arrangements and applies when staff (including supply staff, volunteers, trainee teachers and contractors) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student; and/or
- Possibly committed a criminal offence against or related to a student; and/or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside school, that might make them unsuitable to work with children "transferable risk". Advice can be sought from the LADO in assessing transferable risk).

### Non-recent allegations

Allegations against an adult that is no longer working/volunteering with children must be referred to the Police. Where it is known that the adult is still working/volunteering with children, all allegations (including historical/non-recent allegations of abuse) must be referred to the Police and the LADO in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to a school that they were abused as a child, they must be advised to report the allegation to the police. Non-recent allegations made by a child, must be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

If an allegation is made against anyone working with children in the School, the School must not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to

jeopardise statutory investigations. In borderline cases, the school may discuss informally with the Local Authority 'designated officer' (LADO) on a no-names basis.

All allegations must be investigated as a priority to avoid any delay.

### **Allegations that may meet the harms threshold**

1. All allegations which appear to meet the above reporting criteria are to be **reported straight away to the 'case manager'** who is the Head of School. Where the Head is absent or is the subject of the allegation or concern, reports must be made to Chief Executive Officer (Adam Watson) and Head of Safeguarding. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with Chief Executive Officer, Head of Safeguarding and LADO, and if appropriate, children's social care and the police.
2. **Welfare of the child:** Where the case manager deems that a child has been harmed, or there to be an immediate risk of harm to a child, or if the situation is an emergency, the DSL (or DDSL) must contact Children's Social Care and, as appropriate (e.g. if there is evidence of a possible criminal offence), the Police immediately.
3. **Investigating and supporting the person subject to the allegation:** Before contacting the LADO, schools must conduct basic enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
  - Was the individual in the school at the time of the allegation?
  - Could they have come into contact with the child?

Schools must establish what initial information the LADO will require, and if in doubt check with the LADO before undertaking any initial enquiries, to ensure not to prejudice the position.

4. The case manager must immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. The designated officer must be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
5. All discussions must be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed with the Police/LADO. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

6. **Suspension:** The case manager must give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements must be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, their HR adviser, as well as the police and children's social care if relevant when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the school and shall provide them with their contact details.
7. **Support for the member of staff:** whilst the welfare of the child is paramount, appropriate welfare support must also be made for the member of staff. Information is confidential, and must not ordinarily be shared with other staff, children or parents not directly involved. See further guidance in [KCSIE](#).
8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
9. **Further investigation:** where further investigation is required, the LADO and case manager will agree how and by whom the further investigation will be undertaken.
10. The case manager will discuss with the designated officer whether a referral to the **Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency (TRA)** must be made, noting the requirements of KCSIE. For instance:
  - a. If: 1) the allegation is substantiated; and 2) the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services, then the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
  - b. The employer has a legal requirement to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
    - i. engaged in relevant conduct in relation to children and/or adults,
    - ii. satisfied the harm test in relation to children and/or vulnerable adults; or
    - iii. been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.
  - c. In a case involving serious professional misconduct by a teacher, the case manager must consider whether to make a referral to the TRA. In certain cases, the TRA will consider whether to prohibiting the individual from teaching.
11. Where the initial discussion leads to no further action, the case manager and the LADO must record the decision and justification for it; and agree on what information must be put in writing to the individual concerned and by whom.

12. On conclusion of the case, the case manager must review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future. This must include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons must also be learnt from the use of suspension when the individual is subsequently reinstated. The designate officer and case manager must consider how future investigations of a similar 98 nature could be carried out without suspending the individual.
13. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the designated officer) must consider the facts and determine whether any lessons can be learned and if improvements can be made.
14. **Settlement:** Compromise or settlement agreements **must not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children and will not prevent police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Failure to do so is a criminal offence. The school will continue its investigation if the person leaves, resigns or ceases to provide their services. Schools must check the relevant provisions of KCSIE.

### Information sharing

Staff must be mindful of the guidance set out in KCSIE in relation to sharing information between safeguarding partners during the course of the process of managing allegations against staff.

The school will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

### Allegation outcomes

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. Substantiated allegations must be included in references, provided that the information is factual and does not include opinions (KCSIE). Low level concerns (see below) must not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance (KCSIE).

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager must consider whether the child and/or person who made the allegation is in need of help or may have been abused by someone else, in which case a referral to children's social care may be appropriate.

If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a student who made it in accordance with the school's behaviour policy; or whether the Police must be asked to consider if action might be appropriate against the person responsible even if they are not a student.

### Supply teachers, trainee teachers and all contracted staff

In some circumstances schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business.

Whilst the school is not the employer of supply teachers, they will ensure allegations are dealt with properly. (This includes not ceasing to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome). The school will usually take the lead in collecting the facts when an allegation is made and providing school relevant information required by the LADO as part of the referral process.

### Governors

If an allegation is made against a governor, schools must follow their own local procedures. Where an allegation is substantiated, they must follow the procedures to consider removing them from office.

### Organisations or individuals using school premises

Schools may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools must follow their safeguarding policies and procedures, including informing the LADO.

## CONCERNS THAT DO NOT MEET THE HARM THRESHOLD/LOW – LEVEL CONCERNS POLICY

As part of their whole school approach to safeguarding, the school will ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and,

- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating children.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

### Sharing/reporting a concern

Low-level concerns about a member of staff must be reported to the designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it must be shared with the Head of School or principal. If someone is unclear who they must share their concern with, they must share it with the Inspiring Primaries Academy Trust Head of Safeguarding, who is part of the Central Team. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. The Head of School must be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools, the Head of School may wish to consult with the DSL and take a more collaborative decision-making approach.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school, that concern must be shared with the designated safeguarding lead (or deputy), and/or Head of School, and recorded in accordance with the school's low-level concern/staff code of conduct policy, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the staff member sharing the concern does not wish to be named the school will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share low-level concerns.

If schools are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they must consult with their LADO.

## Self-Reporting

Occasionally an adult may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an adult may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

### How must a low-level concern be responded to

The Head of School must:

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- review the information and determine whether the behaviour (i) is entirely consistent with the school's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, must be reclassified as an allegation and referred to the LADO/other relevant external agencies;
- where the Head of School is in any doubt whatsoever, they must seek advice from the LADO;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis.

Advice must be sought from the Trust HR manager (Bronagh Mulligan) and the Trust HR advisors (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the organisation's Code of Conduct and the law it will still be important for the Head of School to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it; In addition, the Head of School must speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law.

- Some will not give rise to any ongoing concern and, accordingly, will not require any further action;
- Others may be most appropriately dealt with by means of management guidance and/or training;
- A low-level concern may require a conversation with the individual about whom the concern has been raised. This must include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- Some low-level concerns may also raise issues of misconduct or poor performance;
- Some concerns may trigger the organisation's disciplinary, grievance or whistleblowing procedures, which must be followed where appropriate;
- A referral to the LADO as the school believes the threshold has been met.
- The school should exercise their professional judgement and, if in any doubt, they must seek advice from other external agencies including the LADO.

The Head of School should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews must be made.

### Recording concerns

All procedures for recording and storing of records must comply with Inspiring Primaries Academy Trust's Data Protection Policies.

All low-level concerns must be recorded in writing by the Head of School. The record must include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns must also be noted, if the individual wishes to remain anonymous then that must be respected as far as reasonably possible.

The name of the individual sharing the low-level concern, and their role, must be stated, as must the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this must be fairly recorded alongside the concern. The record must include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record must be signed, timed and dated.

There must be appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses;
- all external conversations – for example, with the LADO/other external agencies;
- the rationale for decisions;
- any action taken.

Records must be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it must be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The school must retain the record consistent and comply with Inspiring Primaries Academy Trust Data Protection policies. The school must retain all records of low-level concerns (including those which are subsequently deemed by the Head of School to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these must be kept in chronological order as a running record. These records must be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Head of School and the individual they report to (e.g. Area Director of Schools); and HR manager. The Head of School may store the central low level concerns file with his/her other safeguarding and child protection records.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this must be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern must be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is reclassified as an allegation, all previous records of low-level concerns relating to the same individual must be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE.

When a staff member leaves and/or takes up new employment, that creates a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

Low-level concerns must not be referred to in references unless they relate to issues which would ordinarily be included in a reference, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) must not be referred to in a reference. Where a low-level concern (or group of concerns) has met the threshold for referral to LADO and found to be substantiated, it must be referred to in a reference. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious must also not be included in any reference.

The school will refer to Part Four, Section Two of KCSIE for further advice and guidance.

## STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The school's code of conduct can be found [here](#). The aim of the code of conduct is to provide clear guidance about behaviour and actions and responses to low level concerns in order not to place students or staff at risk of harm or of allegation of harm to a student.

## SAFER RECRUITMENT

The school is committed to safer recruitment processes and ongoing safer working practices. Members of the teaching and non-teaching staff at the school including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work with children without a cleared DBS check. In this case, the individual will have a separate Barred List check, and the school will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed, and the individual will be appropriately supervised. Please refer to the Inspiring Primaries Academy Trust Safer Recruitment Policy available on the Inspiring Primaries Academy Trust [website](#).

Full details of the school's safer recruitment procedures for checking the suitability of staff, members of the School LGC and Trustees of IPAT and volunteers to work with children and young people is set out in Inspiring Primaries Academy Trust Safer Recruitment Policy;

The school's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is set out in the Trust's Recruitment and Selection Policy.

## MANAGEMENT OF SAFEGUARDING

The School's DSL is **Jodie Allen** who is a member of the leadership team.

**Chris Gray and Caroline McMurran are Deputy DSL** and the persons to whom reports must be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the school. The DSL's responsibility is to maintain an overview of safeguarding within the school (including online safety and understanding the filtering and monitoring systems and processes in place), to open channels of communication with local statutory agencies, to liaise closely with safeguarding partners (such as children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the school's policies and procedures in practice. The DSL (and DDSL) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

The DSL works with the LGC to review and update the school's safeguarding policy. Where a student leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) **within five days for an in-year transfer, or within the first five days of a new term**, and the exporting school should provide a **clear structured summary** of current concerns, context and support needs.. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse, who have a social worker, or who are receiving support through the Channel programme, and have that support in place for when the child arrives. The school will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL must be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This must include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The DSL will inform the safeguarding partners of any incident which they think must be considered for a child safeguarding practice review.

The DSL regularly reviews the school's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report

welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and DDSL will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, the school's arrangements for sharing concerns are:

If you have an **urgent out of hours safeguarding concern**, you can contact First Response Children's Duty Team on **0116 305 0005** where you will be able to speak to a Social Worker about your worries. The Social Worker will discuss these with you and take as much information as possible. This can be done anonymously.

If you wish to report a safeguarding concern directly to school out of hours, you may make use of the following email address:

[dslUllesthorne@ipat.uk](mailto:dslUllesthorne@ipat.uk)

One of our school DSLs (designated safeguarding leads) will respond to your email asap as a matter of urgency.

Full details of the DSL's role can be found at Annex B of KCSIE.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility must not be delegated.

## TRAINING

Induction and training (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) are in line with advice from local safeguarding partners.

### All Staff

All new staff will be provided with induction training that includes:

- Safeguarding and child protection, including online safety
- the child protection policy, including information about the identity and role of the DSL(s) and DDSL.
- the behaviour policy (which must include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the safeguarding response to children who go missing from education
- the staff code of conduct including the school's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media
- a copy of Part 1 of KCSIE (Current edition/publication)

- All staff, including those who do not work directly with children, will read Part One of KCSIE. Staff will also be provided with the DfE's Part One: Overview for All Staff as a supplementary document

Copies of the above documents are provided to all 'staff' during induction. The staff code of conduct can be found on iAM Compliant.

As part of the whole school safeguarding approach, all staff are also required to:

- Read Part One of KCSIE and give written confirmation that they have done so.
- Each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes via INSET training.
- Understand key information contained in Part One of KCSIE. The school will ensure staff understanding by ensuring all staff have signed and confirmed to say they have read and understood this.
- Receive training in safeguarding and child protection regularly, in line with advice from the local safeguarding partners. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular updates through the 39 weeks of safeguarding bulletins, to provide them with relevant skills and knowledge to safeguard children effectively. The school provides these via CPOMS.

### **DSL(s) - Designated Safeguarding Lead (s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge skills and authority required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the local safeguarding partners approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of KCSIE

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL is trained to the same level as the DSL.

To ensure continuity of safeguarding responsibilities, the school implements robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other

circumstances. This includes the involvement of Area Directors of School who are also DSL trained.

\*Whilst external catering and maintenance staff are not technically Inspiring Primaries Academy Trust employees (and therefore safeguarding training is not the responsibility of the school), they must receive an appropriate safeguarding induction to ensure they are aware of and understand all the school's relevant safeguarding policies (e.g. safeguarding policy/whistleblowing policy).

### Governors and Trustees

All governors and Trustees must receive appropriate safeguarding and child protection (including online) training at induction. This training must equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. This training must be regularly updated.

Training for governors and trustees is provided through GovernorHub. Those involved in governance must complete this annually and the training recorded on GovernorHub.

All governors (and proprietors) must be aware of their obligations under the Human Rights Act 1998 and, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

## OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Jane Robson is the board-level lead designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. **Katy Bonser / Carly Allan** are the LGC leads designated to take a lead in relation to responsibility for the safeguarding arrangements in the school. They are a member of the school's LGC.

A review of the school's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The school draws on the expertise of staff, including the DSL(s), in shaping the school's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the school will work with the Local Authority designated officer to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

## THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

### Opportunities to teach safeguarding

Inspiring Primaries Academy Trust ensures that all students are taught about safeguarding, including online, through the curriculum, Relationships and Sex Education, and Health Education and PSHE.

The school provides 'Preventative Education' in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This programme will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships;
- healthy and respectful relationships;
- boundaries, consent and kindness in relationships;
- stereotyping, prejudice and equality;
- body confidence and self-esteem;
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour;
- the concepts of, and laws relating to – all forms of sexual harassment, and abuse, and how to access support;
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and;
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

The school recognises the additional risks that children with SEND face online. Online safety is an integral part of the school's computing curriculum for all students and is taught in an age-appropriate way relevant to students' lives. It is essential that children are safeguarded from potentially harmful and inappropriate online material. A whole school approach is taken to online safety in the E-Safety Policy that empowers the school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. It is also embedded in PSHE and Relationships and Sex Education. Students will be taught what positive, healthy and respectful online relationships look like; the effects of their online actions on others; how to recognise and

display respectful behaviour online; how to use technology safely, responsibly and securely; and where to go for help and support when they have concerns.

The school has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online, which are reviewed at least once a year for their effectiveness. Reviews include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record is kept of these checks.

The school uses iBoss Filter and iBoss safeguarding monitoring tools to provide filtering and monitoring across the school's internet connection and school-managed devices. iBoss is a cloud-based system which applies filtering policies according to the type of user, including students, staff and visitors. On school-managed devices, filtering is deployed and maintained centrally through the Trust's device-management systems, including Intune. This means filtering remains active when a managed device is used away from the school network, as well as when it is used on site.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

The leadership team and **DDSLs and LGC Safeguarding Lead** must have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively, this means ensuring that a review of their effectiveness is carried out at least once every academic year. Reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's designated safeguarding lead and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

The school will communicate with parents and carers to reinforce the importance of children being safe online and to help them understand what systems schools use to filter and monitor online use. It will be especially important for the school to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

### **Looked after children (and previously looked after children)**

Looked after children (and previously looked after children) are a particularly vulnerable group. The school will ensure that prompt action is taken when necessary to safeguard these children and Inspiring Primaries Academy Trust ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority.

**Jodie Allen** is the designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. The school ensures that the designated member of staff receives appropriate training to carry out

their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

### **Children who need a social worker (Child in Need and Child Protection Plans)**

Local authorities must share the fact a child has a social worker, and the designated safeguarding lead must hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This must be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Where children need a social worker, this must inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **Children who are absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to persistently absent students, and children missing education (CME) supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

### **Young carers**

Schools must be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support, at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

### **Children requiring mental health support**

The school has an important role to play in supporting the mental health and wellbeing of students.

All staff must be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or risk of suicide. They could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

**Only** appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. The school should ensure that any interventions offered are evidenced as safe and effective and appropriate for the need and phase of education

Staff can support the fulfilment of four key roles:

- promoting good mental wellbeing and preventing the onset of mental illness;
- observing students and identifying early those who may be experiencing mental health problems or being at risk of developing one;
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow the school's child protection policy and speak to their DSL or deputy.

If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carers or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

### **Safeguarding children with medical conditions**

A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in a school, the responsible healthcare professional, in

conjunction with the DSL must consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

### Children who are questioning their gender

It is not for schools to initiate any action in this area; this is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school is responding.

Schools must take time to understand the thoughts and feelings of children who are questioning their gender and must be appropriately professionally curious about the full range of the child's experiences. Schools must remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

Schools must not initiate any action regarding social transition. Where a child or their parent has made a request. Members of staff must not adopt any changes relating to social transition unless a decision has been made by the school in consultation with parents or carers.

When considering any request for support with social transition, the schools will ensure that their decision-making process is documented and records are kept.

In making decisions about supporting social transition, the school must comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children.

Decisions will be in line with the following principles, and the school will ensure that their decision-making process is documented and records are kept:

- Schools have statutory duties to safeguard and promote the welfare of all children;
- Parents and carers must be actively involved and their views treated with importance;
- Accommodating social transition is an active intervention so schools must take a very careful approach;
- Schools must comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition;

In all cases the school will refer to the guidance set out in Keeping Children Safe in Education 2026.

### Mobile Phone Policy

The school is a mobile phone-free environment by default; anything other than this must be by exception only:

Extract from *Mobile Phone Policy 2024-27* (full policy available on school website)

*While we fully acknowledge a parent's right to allow their child to bring a mobile phone to school if they walk to and from school without adult supervision, Inspiring Primaries Academy Trust does not permit pupils bringing mobile phones in year groups below Year 5 & 6.*

*When a child needs to bring a phone into school the phone must be left in the school office at the start of the day (from 8.30 a.m.) and collected at the end of the day. Phones should be clearly marked so that each pupil knows their own phone. Parents are advised that Inspiring Primaries Academy Trust accepts no liability for the loss or damage to mobile phones which are brought into school or on to the school grounds.*

*Where a pupil is found by a member of staff to be using a mobile phone, the phone will be confiscated from the pupil, handed to a member of the Senior Leadership Team. The pupil may collect the phone at the end of the school day. Parents will be informed of inappropriate use and pupils will be reminded of the school policy and practice. If this practice continues more than three times, then the school will confiscate the phone until an appropriate adult collects the phone from a Senior Leader.*

*Pupils are not permitted to use their phones whilst on the school site and, if a pupil is found taking photographs or video footage with a mobile phone of either other pupils or teachers, this will be regarded as a serious offence and the pupil will receive a consequence in line with the school's behaviour policy. If images of other pupils or teachers have been taken, the phone will not be returned to the pupil until the images have been removed by the pupil in the presence of a senior teacher.*

*Should a pupil be found to be using their phone inappropriately, the school reserves the right to withdraw this privilege and they will no longer be able to bring a phone into school. Pupils are not entitled to log on to the school network using their mobile phones or other personal electronic devices.*

*Should parents need to contact pupils or vice versa during the school day, this should be done via the usual school procedure of contacting the school office via phone or email.*

*Whilst IPAT schools seek to prohibit the use of mobile phones throughout the school day to reduce distraction and disruption, schools must comply with duties such as the duty to make reasonable adjustments where necessary. There may be other exceptional circumstances where schools should consider making adaptations to this policy for specific pupils due to a disability or medical need.*

*Schools have a duty under the Equality Act 2010 to take such steps as is reasonable to avoid substantial disadvantage to a disabled pupil caused by the school's policies or practices. Allowing a disabled pupil access to their mobile phone during the school day, where it is necessary due to the nature of their disability, may be considered a reasonable adjustment and a failure to do so may be a breach of the school's duty.*

*The Trust has a duty under the Children and Families Act 2014 to have arrangements in place to support pupils with medical conditions. In meeting this duty the trust board or local governing*

*body must have regard to the statutory guidance supporting pupils with medical conditions at school. In some circumstances, supporting a pupil with their medical condition can involve the use of a mobile phone. For example, pupils with diabetes might use continuous glucose monitoring with a sensor linked to their mobile phone to monitor blood sugar levels. Where mobile phone use allows pupils to manage their medical condition effectively, it would not be reasonable for a school to prevent this.*

### **Restrictive interventions, including the use of reasonable force**

There are times when the use of restrictive interventions will be lawful and necessary; for example, to keep individuals and the wider school community safe. The school is aware of statutory guidance from the Department for Education issued under section 93A of the Education and Inspections Act 2006 and must have regard to this in relation to recording and reporting (statutory guidance) each significant incident involving the use of force by members of staff and of other parts which are non-statutory as set out in the guidance outlined in [‘Restrictive interventions, including the use of reasonable force, in schools’](#) (DfE, April 2026).

The school recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions. The school will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty (where relevant). Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force. The trust restrictive intervention policy can be found on the Trust policy portal.

### **Arrangements for Visiting Speakers**

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school’s responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session must actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the Visiting Speaker’s presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The school

shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

### **Use of school premises for non-school activities**

Where governing bodies or proprietors hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the Governing Committee or proprietor, under the direct supervision or management of their school staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The Governing Committee or proprietor will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The Governing Committee or proprietor will also ensure safeguarding requirements 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. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools must expect these providers to have in place.

### **Alternative provision**

Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will ensure it is satisfied that the placement meets the pupil's needs.

The school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so that the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The school will know where a child is based during school hours and will have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They will regularly review the alternative provision placements they make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

## EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

The school will comply with the safeguarding and welfare requirements of the Early Years Foundation Stage Statutory Framework for Group and School-based Providers, including any requirements which apply specifically to registered early years provision. These requirements operate alongside the school's duties under Keeping Children Safe in Education and this policy.

All staff working within the Early Years Foundation Stage must understand the particular safeguarding and welfare requirements applicable to early years children and must ensure that these requirements are implemented consistently in practice.

### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the school's early years or provision of care of students under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the school's safer recruitment practices, further details of which can be found in the Inspiring Primaries Academy Trust Recruitment Policy.

The school records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the school will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the school will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

### **Suitability of staff and volunteers**

The school will ensure that all individuals working with children in the Early Years Foundation Stage are suitable to fulfil the requirements of their roles and that all required suitability, identity, qualification and vetting checks have been completed.

Where the early years provision is subject to the relevant EYFS registration requirements, the school will obtain the required enhanced criminal records and barred list checks for staff and volunteers in accordance with the Early Years Foundation Stage statutory framework and Keeping Children Safe in Education. This includes volunteers where the statutory requirements apply, including those who are supervised, subject to the limited exceptions set out in the statutory framework.

Staff and prospective staff must disclose any information which may affect their suitability to work with children, including relevant arrests, charges, convictions, cautions, court orders, reprimands or warnings, whether arising before or during their employment. Staff must notify the school without delay of any change in their circumstances which may affect their suitability to work with children.

Where the EYFS statutory requirements prohibit an individual from beginning work or volunteering until the required enhanced criminal records and barred list checks have been received, the school will ensure that the individual does not commence the relevant activity until those checks have been completed.

### **Staff use of mobile phones and cameras (and other relevant devices)**

Inspiring Primaries Academy Trust's policy on the use of mobile phones and cameras (and other relevant devices) in the setting can be found [here](#).

### **DSL for the EYFS**

The DSL in the early years settings is **Jodie Allen**

### **Duty to notify/report to Ofsted safeguarding and other serious childcare incidents**

The school will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the school is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the school became aware (or ought reasonably to have become aware) of it.

Where the school is required to do so as a registered provider, it will inform Ofsted of any allegations of harm or abuse by any person living, working or looking after children at the premises. This applies whether the alleged harm or abuse occurred on the premises or elsewhere, for example during an educational visit or other activity.

The school will also notify Ofsted of the action taken in response to the allegation. Notification will be made as soon as is reasonably practicable and in any event within 14 days of the allegation being made.

The school will continue to notify Ofsted of any other event for which notification is required under the Early Years Foundation Stage statutory framework, including significant events affecting the suitability of a person in regular contact with children and any serious accident, illness or injury to, or death of, a child while in the school's care.

The school will notify Ofsted of any serious accident, illness or injury to, or death of, any child while in their care, and of the action taken. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident occurring. A registered provider, who, without reasonable excuse, fails to comply with this requirement, commits an offence. Providers must notify local child protection agencies of any serious accident or injury to, or the death of, any child while in their care, and must act on any advice from those agencies.

## Absences

The school will follow up on absences in a timely manner. If a child is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts. The school will consider patterns and trends in a child's absences and their personal circumstances and use their professional judgement when deciding if their absence must be considered as prolonged. Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

The school has an attendance policy that they share with parents and/or carers. This includes expectations for reporting child absences and the actions the nursery will take if a child is absent without notification or for a prolonged period of time, for example: implementing the setting's safeguarding procedures, following up with the parents and/or carers and contacting emergency contacts if parents and/or carers are not contactable.

Where possible, settings must hold more than two emergency contact numbers for each child.

## Children's screen use

The school will have regard to the Department for Education's guidance on children's screen use in early years settings. Screen use within the Early Years Foundation Stage will be carefully considered, age appropriate and purposeful, and will support identified learning and development aims.

The school will take a precautionary approach to screen use, recognising the importance of physical activity, play, communication, interaction, sleep and positive relationships for children's development. Staff will consider children's individual needs and will ensure that the use of screens does not unnecessarily replace high-quality adult interaction, play or physical activity.

## Waiver from Disqualification

In certain circumstances, a person who is disqualified from registration by Ofsted may apply to Ofsted for a waiver of disqualification unless, for example, they are barred from working with children.

## Safe Working Practice

Children's privacy is considered and balanced with safeguarding and support needs when changing nappies and toileting.

**Police attendance on school site (Statutory Guidance – PACE Code C 2019)** Students may only be interviewed at their place of education in exceptional circumstances and only when the Head of School or their nominee agrees. Every effort will be made to notify the parent(s) or other person responsible for the student's welfare and the appropriate adult, if this is a different person, that the police want to interview the student and reasonable time will be allowed to enable the appropriate adult to be present at the interview. If awaiting the appropriate adult would cause unreasonable delay, and unless the student is suspected of an offence against the educational establishment, the principal or their nominee will act as the appropriate adult for the purposes of the interview.

## APPENDIX 1 –FURTHER INFORMATION

All staff must be aware of indicators of abuse and neglect, as well as specific safeguarding issues such as child criminal exploitation and child sexual exploitation and modern slavery. Staff must always be vigilant, and if unsure, must **always** speak to the DSL or DDSL.

All school staff must be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from other children within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another, and children can therefore be vulnerable to multiple threats.

All staff must be aware that behaviours linked to drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education and consensual and non-consensual sharing of nudes and semi-nude's images and/or videos can be signs that children are at risk.

This appendix contains important additional information about specific forms of abuse and safeguarding issues.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other

children (also known as child-on-child abuse) is a specific safeguarding issue in education and all staff must be aware of it and of their school's policy and procedures for dealing with it.

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

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

### **Child criminal exploitation (CCE) and child sexual exploitation (CSE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal and sexual exploitation
- associate with other children involved in exploitation

- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) is a form of child sexual abuse; it can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. This can be committed by an individual or an organised network and most sexual abuse is committed by individuals known to the victim. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: [Child sexual exploitation: guide for practitioners](#).

### County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line." This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

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

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;

- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters, and,
- have their bank accounts used to facilitate drug dealing.

### Children who are absent from education

All staff must be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing education procedures.

### Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded,
- 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

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

## Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse,’ (including physical, sexual, emotional abuse, and stalking). Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures must be followed and both young victims and young perpetrators must be offered support.

## Operation Encompass

Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child’s education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse.<sup>1</sup> This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently.

## National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

## Homelessness

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

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it must also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children, and the designated safeguarding lead (or a deputy) must ensure appropriate referrals are made based on the child's circumstances.

## Modern slavery and the National Referral Mechanism

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs.

## Preventing radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk must be a part of a schools safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff must be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff must use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

## Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

## Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending.

There are a number of indicators, which may signal children are at risk from, or are involved in serious violence. These may include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in educational performance;
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and,
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male,
- having been suspended, spent time in Alternative Provision or permanently excluded from school, and,

- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Professionals must also be aware that violence can often peak in the hours just before or just after school, when students are travelling to and from school and can concentrate in particular places.

Concerns regarding possession of weapons, threats involving weapons or expressed intent to carry weapons must be reported immediately to the DSL.

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support; practical guidance on evidenced support is available from the [Youth Endowment Fund \(YEF\)](#) (the “what works” centre for preventing violence).

### **Honour or faith-based abuse (including female genital mutilation and forced marriage)**

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they must speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children’s social care.

### **FGM mandatory reporting duty for teachers**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>157</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead (or a deputy) and involve local authority children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual

evidence) or in cases where the woman is 18 or over. In these cases, teachers must follow local safeguarding procedures.

### **Forced marriage**

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



## APPENDIX 2: Safeguarding Calendar

| Term          | School Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Trust Action                                                                                                                                                                                                                  | Governance Reporting                                                                                                                                                                                                                                         |                                                                                                                                                |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
|               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                               | Local Trust Committee                                                                                                                                                                                                                                        | Trust Board                                                                                                                                    |
| <b>Autumn</b> | <ul style="list-style-type: none"> <li>- Check reviewed CP Policy is on school website.</li> <li>- Check dates for statutory safeguarding training are booked:                             <ul style="list-style-type: none"> <li>* DSL refresher training;</li> <li>* New DSL training;</li> <li>* Managing Allegations;</li> <li>* Safer Recruitment.</li> </ul> </li> <li>- Website Check.</li> <li>- Comprehensive check of SCR (incl. volunteers and visitors) and latest template.</li> <li>- Staff safeguarding training updates booked.</li> <li>- Internal School Safeguarding Audits.</li> <li>- Review outstanding actions from any reviews conducted in previous year</li> </ul> | <ul style="list-style-type: none"> <li>- Trust DSL Network Meeting – Safeguarding Practice/Policy Review incl.</li> <li>- Check school SCR</li> <li>- Trust Safeguarding Reviews every two years for all schools</li> </ul>   | <ul style="list-style-type: none"> <li>- Adopt updated Child Protection/Safeguarding policies.</li> <li>- Confirm submission of Annual Safeguarding Return.</li> <li>- Confirm Autumn Term</li> <li>- Safeguarding training and actions in place.</li> </ul> | <ul style="list-style-type: none"> <li>- Safeguarding Lead Report to Trustees</li> <li>- Adopt reviewed Trust Safeguarding Policies</li> </ul> |
| <b>Spring</b> | <ul style="list-style-type: none"> <li>- Spring Check SCR for new recruits</li> <li>- Safeguarding Governor monitoring visit</li> <li>- Staff safeguarding training updates</li> <li>- Website check</li> <li>- Review outstanding actions from any reviews conducted during autumn/spring term</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>- Check Academy SCR</li> <li>- Monitor progress against internal audit action plan</li> <li>- Trust Safeguarding Audits for some academies</li> </ul>                                  | <ul style="list-style-type: none"> <li>- HT Report to LGC to include outcomes of safeguarding audit monitoring and Spring Actions</li> <li>- Safeguarding Governor visit report</li> </ul>                                                                   | <ul style="list-style-type: none"> <li>- Safeguarding Lead Report to Trustees</li> </ul>                                                       |
| <b>Summer</b> | <ul style="list-style-type: none"> <li>- Summer Check SCR for new recruits</li> <li>- Staff safeguarding training updates</li> <li>- Website Check</li> <li>- Complete LA annual safeguarding return</li> <li>- Review outstanding actions from any reviews conducted during the year</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>- Trust DSL Network Meeting</li> <li>- Review IPAT Safeguarding Policy and Practice Guidance and refresh on trust website</li> <li>- Safeguarding Audits for some academies</li> </ul> | <ul style="list-style-type: none"> <li>- Annual Safeguarding Return</li> </ul>                                                                                                                                                                               | <ul style="list-style-type: none"> <li>- Safeguarding Lead Report to Trustees</li> </ul>                                                       |