Inspiring Futures through Learning

# Child Protection and Safeguarding Requirements and Procedures within IFtL*

September 2026 – September 2027

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| **Policy name:** | Child Protection and Safeguarding Requirements and Procedures in IFtL |
| **Version:** | V11 |
| **Date relevant from:** | September 2026 |
| **Date to be reviewed:** | September 2027<br>*This policy will be reviewed every year unless legislation dictates otherwise. Recent changes in Legislation will need to be read and used to review this Policy.* |
| **Role of reviewer:** | IFtL Head of Safeguarding, Health, Children & Families, IFtL Deputy Designated Safeguarding Lead. |
| **Statutory (Y/N):** | Y |
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|---|---|
| **Policy level**:** | 1 |
| **Relevant to:** | All employees through all IFtL schools and departments |
| **Bodies consulted:** | Employees<br>Trade unions<br>School / department governance bodies |
| **Approved by:** | IFtL Board of Trustees |
| **Approval date:** | |

**Key:**

**** Publication on website:***

| **IFtL website** | | **School website** | |
|---|---|---|---|
| 1 | Statutory publication | A | Statutory publication |
| 2 | Good practice | B | Good practice |
| 3 | Not required | C | Not required |

***** Policy level:***

1. Trust wide:
   - This one policy is relevant to everyone and be consistently applied across all schools and Trust departments with no variations.
     - *Approved by the IFtL Board of Trustees.*
2. Trust core values:
   - This policy defines the values to be incorporated fully in all other policies on this subject across all schools and Trust departments. This policy should therefore from the basis of a localised school / department policy that in addition contains relevant information, procedures and / or processes contextualised to that school / department.
     - *Approved by the IFtL Board of Trustees as a Trust Core Values policy.*
     - *Approved by school / department governance bodies as a relevantly contextualised school / department policy.*

3. School / department policies
   - These are defined independently by schools / departments as appropriate
     - *Approved by school / department governance bodies.*

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**Important contacts: IFtL Trust Wide**

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| Chief Executive Officer of the IFtL School Trust | Sarah Bennett | sbennett@IFtL.co.uk<br>07738 111178 |
| IFtL Designated Safeguarding Lead | Victoria Blackmore | vblackmore@IFtL.co.uk<br>07909 257778 |
| IFtL Deputy Designated Safeguarding Lead | Victoria Gidman | vgidman@IFtL.co.uk<br>07350 364514 |
| IFtL Deputy Designated Safeguarding Lead | Jamie Ainscow | Jainscow@IFtL.co.uk |
| IFtL Designated Safeguarding Lead for TMA ITT | Michelle Gardner | Mgardner@IFtL.co.uk |
| IFtL Designated Safeguarding Officers | Michelle Gardner<br>Penny Meehan<br>Toni Cole<br>Jezamin Lindsay<br>Alice Hedges | Mgardner@IFtL.co.uk<br>Pmeehan@stmaryswavendoncofe.co.uk<br>tcole@IFtL.co.uk<br>JLindsay@woodnewtonschool.co.uk<br>AHedges2@newchapterprimary.co.uk |
| IFtL Prevent Specific Point of Contact; Designated Child Sexual Exploitation Lead (CSE); Designated Looked After Children Lead | Victoria Blackmore | vblackmore@IFtL.co.uk<br>07909 257778 |
| Board of Trustees Chair | Marilyn Hubbard | Mhubbard@IFtL.co.uk |
| Designated Trustee for Safeguarding and Safer Recruitment | Marilyn Hubbard | Mhubbard@IFtL.co.uk |
| IFtL Human Resources contact | Amelia Perrin<br>Chelsea Angelos | aperrin@iftl.co.uk<br>CAngelos@iftl.co.uk |

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| Whistleblowing Contacts | CEO, Sarah Bennett<br>IFtL DSL, Victoria Blackmore<br>IFtL DDSL, Victoria Gidman<br>IFtL DDSL, Jamie Ainscow<br>Trustee, | sbennett@IFtL.co.uk<br>vblackmore@IFtL.co.uk<br>07909 257778<br>vgidman@IFtL.co.uk<br>07350 364514<br>Jainscow@IFtL.co.uk |
| | IFtL Whistleblowing Hotline<br>NSPCC Whistleblowing Advice Line<br>Protect (UK) | 01908 794051<br>0800 028 0285 help@nspcc.org.uk<br>0203 117 2520 info@protect-advice.org.uk |
| GDPR | If there are any concerns with regards to data breaches (for example, where data is lost, accidentally deleted our stolen), the Data Protection Officer – Jason Smith within IFtL – must be informed immediately.<br>Jsmith@IFtL.co.uk 07741 292555<br>Rsmith@IFtL.co.uk 07909 257776 | |
| Police | Thames Valley Police 101<br>Emergency 999 | 101<br>999 |

**Important contacts: Milton Keynes schools**

| | | |
|---|---|---|
| Multi Agency Safeguarding Hub (MASH team) | Civic Offices Saxon Gate East Central Milton Keynes, MK9 3EJ | Safeguarding Children<br>01908 253169 / 253170<br>Out of hours<br>01908 265545<br>children@milton-keynes.gov.uk |
| Adults at risk – Safeguarding Adults | If you are worried about a vulnerable adult<br><br>Civic Offices Saxon Gate East Central Milton Keynes, MK9 3EJ | 01908 252835<br>Out of hours (5:00pm – 08:45am Monday – Friday Weekends & Bank holidays 24 hrs)<br>01908 252055<br>safeguardingadults@milton-keynes.gov.uk |
| Local Authority Designated Officer (Formerly known as Designated Officer) | Civic Offices Saxon Gate East Central Milton Keynes, MK9 3EJ | 01908 254307<br>LADO@milton-keynes.gov.uk |
| MK Together Safeguarding Partnership | Civic Offices Saxon Gate East Central Milton Keynes, MK9 3EJ | 01908 254373<br>mktogether@milton-keynes.gov.uk |
| Joint Police and Children's Social Care Protocol for Dealing with Children Missing from Care | Children Missing Education Team<br>cme@milton-keynes.gov.uk<br>01908 253338 | |

**Important contacts: Corby schools**

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| Multi Agency Safeguarding Hub (MASH team) | Children, Families and Education<br>Criminal Justice Centre<br>700 Pavilion Drive<br>Northampton<br>NN47YL | 0300 126 7000 |
| Adults at risk – Safeguarding Adults | North Northamptonshire Council covers the following areas:<br>• Kettering<br>• Corby<br>• East Northants<br>• Wellingborough<br>Safeguarding referral - Customer Portal<br>0300 126 3000<br><br>West Northamptonshire Council covers the following areas:<br>• Daventry<br>• Northampton<br>• South Northants<br>Instructions \| Complete an adult safeguarding notification<br>0300 126 7000 | |
| Local Authority Designated Officer (Formerly known as Designated Officer) | Children, Families and Education<br>Criminal Justice Centre<br>700 Pavilion Drive<br>Northampton<br>NN47YL | Business Support:<br>Lisa Austin 07884 615005<br>Adebola Attah 07836 690052<br>Beth Panter 07386 687844<br>LADO Officers:<br>Andy Smith 07850 854309<br>Sian Edwards 07738 636449<br>Francesca Hamilton 07712 718701<br>LADOConsultations@NCTrust.co.uk |
| Joint Police and Children's Social Care Protocol for Dealing with Children Missing from Care | Children Missing Education, North Northamptonshire Council<br>Report a child missing from education - Customer Portal - Introduction<br>Children Missing Education, West Northamptonshire Council<br>Data Protection Agreement \| Report a child missing from education | |

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| Northamptonshire Safeguarding Children Partnership | Email: NSCP@NorthNorthants.gov.uk<br><br>Northampton Safeguarding Children Partnership<br>North Northamptonshire Council<br>Municipal Offices<br>Bowling Green Road<br>Kettering<br>NN15 7QX | |

**IFtL School Designated Safeguarding Leads**

| ROLE/ORGANISATION | NAME OF DSL | CONTACT DETAILS |
|---|---|---|
| Ashbrook School | Toni Cole | tcole@IFtL.co.uk |
| Brooklands Farm Primary School | Sarah Langford | slangford@brooklandsfarmschool.co.uk |
| Chestnuts Primary School | Lauren Seagrave | Lseagrave@chestnutsprimary.co.uk |
| Exeter – A Learning Community | Jennifer Doherty | JDoherty@exeterschool.co.uk |
| Fairfields Primary School | Debbie Walker | dwalker@fairfieldsprimary.co.uk |
| Glebe Farm School | Carl Robinson | crobinson@glebefarmschool.co.uk |
| Heronsgate School | Sarah Cox | SCox@heronsgateschool.co.uk |
| Heronshaw School | Bridget Nicholls | BNicholls@heronshawschool.co.uk |
| Holmwood School | Toni Cole | tcole@IFtL.co.uk |
| Heronshill School and Nursery | Bridget Nicholls | BNicholls@heronshawschool.co.uk |
| Lavendon School | Kim Millican | KMillican@iftl.co.uk |
| New Chapter Primary School | Alice Hedges | AHedges2@newchapterprimary.co.uk |
| Olney Infant Academy | Kim Millican | KMillican@iftl.co.uk |
| Olney Middle School | Eno-Abasi Hall | EHall@olneymiddle.co.uk |
| Portfields Primary School | Kelly Rae | kelly.rae@portfields.org |
| Priors Hall – A Learning Community | Jen Forshaw | jforshaw@priorshallschool.co.uk |
| Rickley Park Primary School | Maddie Boothroyd | MBoothroyd@rickleypark.co.uk |
| St. Mary & St. Giles (SMSG) Church of England School | Cath Hoskin | choskin@smsgschool.co.uk |
| St Mary's Wavendon C of E Primary School | Penny Meehan | Pmeehan@stmaryswavendoncofe.co.uk |
| Two Mile Ash School | Holli Isherwood-Crook | Hisherwood-crook@tmaschool.com |
| TMA ITT | Michelle Gardner | mgardner@iftl.co.uk |

| ROLE/ORGANISATION | NAME OF DSL | CONTACT DETAILS |
|---|---|---|
| Whitehouse Primary School | Jackie Puddephatt | JPuddephatt@whitehouseprimary.co.uk |
| Woodnewton A Learning Community | Jezamin Lindsay | JLindsay@woodnewtonschool.co.uk |

**Important contacts: Ashbrook school**

| ROLE/ORGANISATION | NAME | CONTACT DETAILS |
|---|---|---|
| Headteacher | Jamie Ainscow | JAinscow@iftl.co.uk |
| Designated Safeguarding Lead | Toni Cole | tcole@iftl.co.uk |
| Deputy Designated Safeguarding Lead | Jamie Ainscow | JAinscow@iftl.co.uk |
| Designated Safeguarding Officers | Lauren Almond<br>Cheryl Ferguson | Lalmond@Ashbrookschool.net<br>CFerguson@Ashbrookschool.net |
| Designated Teacher for Children looked after/ Kinship Care/ SGO. | Jamie Ainscow | JAinscow@iftl.co.u |
| Designated Teacher for children with a social worker. | Jamie Ainscow | JAinscow@iftl.co.uk |
| Prevent Specific Point of Contact; Designated Child Sexual Exploitation Lead (CSE); | Toni Cole | tcole@iftl.co.uk |
| Designated Governor for PREVENT | Garry Beardsworth | Gbeardsworth@iftl.co.uk |
| Designated Governor for Safeguarding and Safer Recruitment | Garry Beardsworth | Gbeardsworth@iftl.co.uk |
| Human Resources contact | Sharon Kelly | office@holmwoodschool.co.uk |

## 1. Aims

Safeguarding is everybody's business. Schools within Inspiring Futures through Learning (IFtL) Trust have an unwavering commitment to safeguarding to ensure that all our children are safe and feel safe; that children, parents, carers and staff are able to talk about any safeguarding concerns and feel assured that they will be listened to; and that all staff and volunteers understand and implement safeguarding procedures and guidance, including what to do if they suspect a child or young person may be experiencing, or be at risk of harm. We instil a culture of vigilance. This culture of safeguarding underpins everything that our Trust and its schools have in place.

We aim to create a culture within our schools, where all staff and volunteers are committed to safeguarding children and where students and their families feel supported and safe.

To facilitate this, we

- Fully implement safer recruitment procedures
- Create an effective network of support around children who may be vulnerable through timely identification, assessment and appropriate multi-agency intervention where required.
- Listen carefully to what children say, take what they say seriously and always respond to their concerns, passing on concerns to the appropriate safeguarding agencies, including MASH, where necessary.
- Work in partnership with parents, carers, and multi-agency professionals to protect children
- Identify, record, share and respond to safeguarding concerns in an appropriate and timely manner.
- Take an appropriate interest in children's lives (including their online lives), recognising that children's experiences outside school, including online, can have a significant impact on their safety and wellbeing.
- Create a culture of learning, ensuring that safeguarding training is provided regularly, through induction, updates and ongoing professional development.
- Develop policies, procedures, and training to support a safe culture and ensure that these are fully implemented and followed.

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are professionally trained in recognising and reporting safeguarding issues.
- Staff are confident in questioning and challenging safeguarding practice, if they believe that appropriate action is not being taken.
- Staff act as an advocate for children, creating a safe space, with trusted professionals who fully support them.
- Staff advocate for children's safety, whilst working with other agencies, keeping the welfare of the child as the foremost concern.

Safeguarding practice within our Trust is underpinned by the statutory definition set out in Working Together to Safeguard Children (2026). Safeguarding and promoting the welfare of children includes:

- 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.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the children's Social Care National Framework.

### 1.1 Safeguarding Statement

This safeguarding statement will be included within all IFtL policies and core documentation:

Safeguarding is everybody's business. IFtL MAT is committed to ensuring that all our children are safe and feel safe. The right of every child and young person within the IFtL community to be safe and feel safe is fundamental. Safeguarding and child protection is crucial, and we are fully committed to ensuring the welfare and safety of all our children and staff. IFtL and all the schools within the Trust must fully adhere to all safeguarding and child protection legislation, policy, and procedures at all times and under any circumstances. Safeguarding concerns relating to Trust-wide matters will be referred to the Trust Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs). Concerns relating to individual pupils will be managed by the DSL within the relevant school in accordance with this policy and local safeguarding procedures. IFtL will comply with all applicable safeguarding legislation, statutory guidance and local safeguarding partnership arrangements.

Our Governors and Trustees are fully engaged with the development and implementation of policies and procedures within individual schools. They are clear about their legal responsibilities and the need to question, challenge and audit school processes and procedures. They have responsibility for monitoring and ensuring that policies and procedures are fully implemented and effective within schools. There are regular reports to governors and trustees from headteachers and DSLs that monitor the number of concerns raised, the referrals made and the outcomes. Governors receive appropriate information regarding safeguarding concerns, including allegations against staff, in accordance with confidentiality requirements. Governors and trustees receive appropriate safeguarding training at induction and at regular intervals thereafter to enable them to provide effective challenge, scrutiny and strategic oversight of safeguarding arrangements.

Governors receive safeguarding training at induction, exploring how to scrutinise and challenge information and data. This training is regularly updated.

Regular safeguarding audits, quality assurance and policy reviews are undertaken to ensure safeguarding arrangements remain effective, compliant and fit for purpose.

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026). We comply with this guidance and the safeguarding arrangements published by the three safeguarding partners for Milton Keynes and Northamptonshire (Police, Health and Social Care).

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record (SCR) and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (2024)
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Safer recruitment requirements contained within Keeping children safe in education - GOV.UK which sets standards around recruitment, details the checks that must be undertaken and the documents that must be produced and checked. It also gives details on criminal disclosure, and which offences are protected and not considered in any decision making.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty guidance (2024) which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting children from the risk of radicalisation and being drawn into terrorism.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage (2026).

IFtL schools are committed to remaining compliant with all current and forthcoming safeguarding legislation, statutory guidance and regulatory requirements. IFtL recognises the Children's Wellbeing and Schools Act 2026 and will implement all safeguarding duties arising from the Act

as relevant provisions are commenced and accompanying statutory guidance is published. Policies and procedures will be reviewed and updated to ensure continuing compliance.

The Children's Wellbeing and Schools Act 2026 introduces a range of measures intended to strengthen protections for children, including provisions relating to children not in school. The Act places duties on local authorities to maintain registers of children meet the eligibility criteria, alongside associated requirements relating to information sharing and oversight.

Relevant provisions of the Act may require schools to:

- Review safeguarding, attendance, and information-sharing processes to ensure they remain effective and compliant.
- Support appropriate information sharing with local authorities where required.
- Ensure children who are not attending school or whose educational arrangements change remain appropriately considered within safeguarding processes.
- Continue to strengthen partnership working with local safeguarding partners and other agencies.

IFtL's approach:

- We will review and update relevant policies, procedures and guidance as implementation arrangements and statutory guidance are published.
- DSLs, senior leaders, governors and trustees will receive appropriate updates and training regarding any new responsibilities.

Any changes to safeguarding, attendance or information-sharing processes will be communicated through regular CPD, briefings and professional development opportunities.

## 3. Definitions

Safeguarding is broader than child protection. Whilst child protection is an essential part of safeguarding, safeguarding encompasses all actions taken to promote children's welfare, prevent harm, protect children from maltreatment and ensure they grow up in safe and effective care. Safeguarding responsibilities apply to all children, regardless of age, disability, sex, gender reassignment, race, religion or belief, pregnancy or maternity, sexual orientation or any other protected characteristic.

Safeguarding and promoting the welfare of children is defined in Working Together (2026) 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.
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, wherever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

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

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive and controlling behaviour and economic or financial abuse, where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or more adults or by one or more children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Working Together (2026) states that neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).
- Ensure access to appropriate medical care or treatment.
- Provide suitable education.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Child criminal exploitation** occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

**Child sexual exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

**Group-based child sexual exploitation** is defined as two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in the sexual exploitation of children includes introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child or allowing their property to be used for sexual activities with a child and other forms of facilitating or profiting from the sexual exploitation of children. This can be perpetrated within or beyond the family, by both children and adults, and groups can be organised or loosely linked.

**Child-on-child abuse** refers to the abuse of a child or children perpetrated by another child or children.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying).
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- abuse in intimate personal relationships between children.
- 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, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nude and semi-nude images and videos (also known as youth produced sexual imagery or self-generated sexual imagery).
- upskirting/shorting (which is a criminal offence), 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; and
- 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).

**Children questioning their gender** are considered further within Section 5 of this policy in line with Keeping Children Safe in Education (September 2026).

**The sharing of nude and semi-nude images and/or videos** (also known as self-generated sexual imagery) refers to the sharing of nude or semi-nude images, videos or live streams created by children.

**Children** includes everyone under the age of 18.

Within this policy:

- **Parent** refers to birth parents and other adults in a parenting role, for example adoptive parents, stepparents and foster carers.
- **Staff or 'members of staff'** refers to all teaching, non-teaching, support, supply, agency, peripatetic and contract staff, governors, trustees and volunteers working in or on behalf of the school.

Keeping Children Safe in Education (September 2026) may be abbreviated to 'KCSIE'.

Child abuse and neglect may result in significant harm. The legal definition of harm is set out in section 31(9) of the Children Act 1989, as amended by Adoption and Children Act 2002.

For the purposes of the Children Act 1989:

- "harm" means ill-treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.
- "development" means physical, intellectual, emotional, social or behavioural development
- "health" means physical or mental health
- "ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical

The following three **safeguarding partners** are defined in the Children Act 2004 (as amended) and are identified in KCSIE. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- An integrated care board
- The chief officer of police for a police area in the LA area

The safeguarding partners are responsible for agreeing and publishing local multi-agency safeguarding arrangements, setting local procedures and monitoring the effectiveness of safeguarding practice across partner agencies. Schools will work in accordance with these local arrangements.

## 4. Equality, Diversity and Inclusion

Some children have an increased risk of abuse, neglect or exploitation and may face additional barriers to recognising, reporting or disclosing concerns. IFtL is committed to anti-discriminatory practice and recognises the diverse experiences, identities and needs of all children. We will ensure that every child receives appropriate safeguarding support and protection, recognising that some children may require additional support because of their individual circumstances or the barriers they face. For more details on each school's equality statement, please visit the school website.

We give special consideration to children who:

- Have special educational needs, disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination because of a protected characteristic under the Equality Act 2010, including race, religion or belief, sex, disability, sexual orientation, or gender reassignment.
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance misuse or domestic abuse
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are from military service families
- Are subject to private fostering arrangements
- Are at risk due to either their own or a family member's mental health needs

- Are looked after or previously looked after (see section 12)
- Are absent from education
- Are, or are perceived to be, LGBTQ+
- Where a parent/carer has expressed an intention to remove them from school to be educated at home

The above list is not exhaustive. Any child may be vulnerable at different times in their life, and staff should remain professionally curious and alert to changes in presentation, behaviour, attendance, relationships or family circumstances. Children may not recognise that they are experiencing abuse or neglect, or may feel unable to disclose concerns because of fear, shame, embarrassment, coercion, manipulation or grooming.

IFtL schools will not tolerate bullying, harassment, discrimination, victimisation or prejudice of any kind. We recognise our duties under the Human Rights Act 1998 and the Equality Act 2010, including the Public Sector Equality Duty. As highlighted within KCSIE 2026, being subjected to harassment, violence and or abuse, including sexual harassment and sexual violence, may breach a child's rights under the Human Rights Act 1998. Staff must respond appropriately to all incidents and challenge behaviour that undermines children's safety, dignity or wellbeing.

Provisions within the Equality Act allow IFtL to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting our pupils with certain protected characteristics in order to meet their specific need. IFtL could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for disabled children.

Children who are LGBTQ+, or who are perceived to be LGBTQ+, may be particularly vulnerable to bullying, harassment or abuse. Children who are, or are perceived to be, LGBTQ+ can be targeted by other children. In some cases, risks can be compounded where children lack a trusted adult with whom they can discuss concerns. Staff should remain alert to the potential additional vulnerabilities faced by these children and ensure that all concerns relating to bullying, harassment, discrimination or abuse are taken seriously and responded to appropriately.

Children may experience multiple and intersecting vulnerabilities, and staff should consider the whole context of a child's life when assessing risk and identifying support.

IFtL has a zero-tolerance approach to bullying, discrimination, harassment and abusive behaviour of any kind. All concerns will be taken seriously, investigated promptly and responded to appropriately. Alongside responding to incidents, we are committed to creating inclusive school communities through education, positive relationships and a culture of respect.

Children questioning their gender may have additional safeguarding needs. Schools will respond in accordance with Keeping children safe in education 2026, ensuring that safeguarding and the child's welfare remain the paramount consideration. Further guidance is provided in Section 5 of this policy.

## 5. Children Questioning Their Gender

IFtL recognises that, in recent years, there has been an increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

It is important to recognise that it is common for children to engage in activities that are less typically associated with their sex. For example, children may have interests, behaviours or preferences that do not align with traditional gender stereotypes. Some children may go through a period of questioning their gender, and schools should respond with care, sensitivity and a focus on the individual circumstances of the child.

In accordance with Keeping Children Safe in Education (2026), schools will not initiate social transition. This guidance applies where a child or their parent/carer has raised a request relating to social transition to which the school is responding.

Where a child is questioning their gender, staff should take time to understand the thoughts and feelings of the child and remain appropriately professionally curious about the full range of the child's experiences. Schools should remain aware of the potential vulnerabilities of children who are questioning their gender, including possible complex mental health and psychological needs, relationships with family, peers and their wider social environment, including experiences of discriminatory bullying.

Schools should be respectful places where bullying, harassment and discrimination are not tolerated. Any concerns will be addressed in line with the Trust's behaviour and anti-bullying procedures.

Where a child or parent/carer requests support relating the social transition, the school will carefully consider the request in line with its statutory safeguarding duties, equality and human rights obligations, and the best interests of the child and other children. The DSL will be involved in these considerations and decisions will be appropriately documented and reviewed.

Parents and carers will be involved as a matter of priority when responding to requests for support with social transition, recognising their important role in the lives of their children. In the rare circumstances where involving parents/carers may present a greater risk to the child, the DSL will determine what safeguarding action is required before parents/carers are contacted.

Schools will maintain flexibility and avoid rigid rules based on gender stereotypes. Any support agreed will consider the welfare and safety of the child and others and will be reviewed where circumstances or needs change.

Further information regarding the Trust's approach to requests for support relating to gender questioning and social transition, including considerations relating to facilities such as toilets and changing rooms, is set out in Appendix 5: Children Questioning their Gender – Supporting Guidance.

## 6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. Everyone who comes into contact with children and families has a role to play in identifying concerns, sharing information appropriately and taking prompt action. Staff are expected to exercise professional curiosity and understand that safeguarding concerns may arise in a range of contexts.

This policy applies to all staff, volunteers, supply staff, peripatetic staff, governors, trustees and anybody providing services to our schools within IFtL and is consistent with the procedures of its safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. We have regard to relevant statutory guidance, including 'Keeping children safe in out of school settings 2026'.

Where rooms are rented out to organisations who provide activities or services involving children or vulnerable adults, the school has a written agreement confirming that appropriate safeguarding arrangements and relevant checks are in place. Any safeguarding concerns relating to the children

that arise through these arrangements must be shared with the school DSL in accordance with agreed procedures.

### 6.1 All staff

All staff will read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and will be asked to confirm annually that they have read and understood Part One of KCSIE.

All staff will sign a declaration at the beginning of each academic year to say that they have read, understood and will adhere to the guidance. This declaration is referred to as the IFtL signing agreement.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role of the designated safeguarding lead (DSL) and deputy and other designated officers, the behaviour policy, the online safety policy, and the safeguarding response to children who are absent from education.
- The internal reporting and recording process for all concerns including low level concerns.
- The early help process (including Early Help Assessments) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding concern or a child tells them they are being abused, neglected or exploited, including specific safeguarding issues such as child-on-child abuse, FGM, Prevent concerns and other forms of harm
- The signs of different types of abuse, exploitation and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, gang activity, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe whilst the issue is investigated.
- That every safeguarding issue raised is taken seriously and that pupils are supported. A culture of openness and transparency, should support children to disclose concerns, knowing that they will be addressed and followed up on

Staff should respectfully challenge decisions where they believe a child remains at risk and follow local escalation procedures where necessary.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

### 6.2 The designated safeguarding lead (DSL) at Ashbrook School.

The DSL is a member of the senior leadership team. Our DSL is Toni Cole. The DSL takes lead responsibility for child protection and wider safeguarding in the school. Additional deputies designated safeguarding officers will be appointed to support the DSL and ensure there is sufficient cover at all times.

During term time, the DSL (or deputy) should always be available during school hours for staff to discuss safeguarding concerns.

Out of school hours, the DSL will be contactable by email on tcole@iftl.co.uk

The DSL will lead the Safeguarding Core Team consisting of a DSL, Deputy DSL and additional designated safeguarding officers (DSOs).

When the DSL is absent, the DDSL – Jamie Ainscow – will act as cover.

If the DSL and DDSL are not available then one of the additional designated safeguarding officers will act as cover (for example, during out-of-hours/out-of-term activities).

The Governing body will ensure that the DSL is given the time, funding, training, resources and support to:

- Enable them to fulfil their role and support other members of staff
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children for early help and child protection.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, and/or police), and support staff who make such referrals directly
- Support the headteacher, governing body and/or appropriate decision makers with referrals to relevant bodies including the Disclosure and Barring Service (DBS), Criminal Justice system (CJS) and the Teaching Regulation Agency (TRA) where required.

The DSL's first responsibility is to safeguard and promote the welfare of the child. Where police or other agencies require involvement with a child, including where a child is to be interviewed, searched or examined, the DSL should seek to ensure that appropriate safeguarding considerations are followed. This includes ensuring that the child's welfare remains central, that relevant legal safeguards and guidance are followed, and that an appropriate adult is identified where required under relevant legislation and guidance (see: PACE Code C 2019 (accessible) - GOV.UK). The DSL should challenge any practice or decision-making which does not appear to be in the child's best interests.

The DSL will also keep the headteacher and governors informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The DSL will take lead responsibility for understanding the filtering and monitoring systems and processes in place. The DSL should liaise with the senior leadership team and the designated online safety lead (where this is a separate role) to ensure filtering and monitoring arrangements are effective.

The full responsibilities of the DSL and deputy and designated safeguarding officers are set out in their job description.

### 6.3 The governing board

The governing board will:

- Ensure that the school has a Designated Safeguarding Lead and that that lead carries out the duties listed above
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development

- Approve this policy, ensuring it complies with statutory requirements, and hold the headteacher to account for its implementation.
- Ensuring that the child protection policy is available to the public and published on the school website.
- Appoint a safeguarding link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL and should not be the headteacher or a member of staff with delegated responsibility or safeguarding.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

Governors will receive safeguarding and child protection training at induction and regular updates thereafter to enable them to fulfil their strategic safeguarding responsibilities. They should ensure they understand Keeping Children Safe in Education and other relevant statutory guidance. Support is also available to governors through the Trust staff.

Section 15 of this policy has information on how governors are supported to fulfil their role.

Note: Governors must not be given details relating to individual child protection cases or situations, in order to ensure confidentiality is not breached.

Governors and proprietors must ensure filtering and monitoring systems are effective, in line with the DfE's filtering and monitoring standards for schools. The filtering and monitoring data will be shared with the governors in FGB.

Governors receive anonymised safeguarding data, trends, themes, learning, quality assurance findings and assurance regarding statutory compliance. Governors should be informed of safeguarding themes, trends and significant incidents where appropriate, taking account of confidentiality requirements.

Data should be broken down to vulnerabilities and categories of harm, where appropriate and where confidentiality can be maintained. Governors are expected to question and scrutinise data, the headteacher should be prepared to respond to those questions.

### 6.4 The Headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources (as directed by the Governors), and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training (with the DSL) regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Ensuring that all staff, volunteers and visitors adhere to the child protection policy.
- The headteacher is responsible for ensuring that safeguarding policies, procedures and practice are effectively implemented across the school. The DSLs support the headteacher to ensure that all staff have knowledge and understanding of safeguarding.

### 6.5 The trust

The Trust safeguarding team will provide support and guidance as appropriate to enable the DSL and headteacher to carry out their roles effectively. This includes a range of quality assurance activities outlined in the IFtL Safeguarding Strategy.

Trustees retain overall accountability for safeguarding and delegate oversight and monitoring functions to Local Governing Bodies. Trustees retain strategic responsibility for ensuring that effective safeguarding arrangements are in place across the Trust.

The Head of Safeguarding will set the strategic safeguarding direction for the Trust, working in an advisory capacity to provide support and guidance to headteachers and DSLs on all safeguarding related matters. The main areas of responsibility include:

- Strategic oversight of developing safeguarding and child protection ensuring statutory compliance and development of this area
- Developing, implementing, and evaluating the impact of an annual safeguarding action plan
- Representing the Trust within strategic multi-agency partnerships
- Implementing the safeguarding strategic plan to promote effective quality assurance and practice improvement
- Providing or facilitating the provision of advice, guidance and coaching support to DSLs on complex safeguarding cases
- Chairing Trust DSL Network Meetings

IFtL is committed to learning from safeguarding practice. The Trust safeguarding team will review relevant learning from Child Safeguarding Practice Reviews (CSPRs), Rapid Reviews, Domestic Abuse Related Death Reviews (DARDRs), local safeguarding partnership learning, thematic reviews and other national safeguarding publications. Where appropriate, this learning will be used to inform safeguarding policies, procedures, quality assurance activities and staff training across the Trust.

Schools should contact **Victoria Blackmore or Victoria Gidman** for further support and guidance.

The Trust safeguarding team will have appropriate access to information required to quality assure safeguarding arrangements, including oversight of Single Central Record (SCR) compliance.

## 7. Confidentiality

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. Information can be shared within the school and externally where this is necessary to safeguard and promote the welfare of a child. Decisions to share or not share information should be recorded, including the rationale for the decision, in accordance with the school's record-keeping procedures.
- Where staff need to share special category personal data, the Data Protection Act (DPA) 2018 and UK GDPR provide conditions that allow this to take place for safeguarding purposes. Staff can share information without consent where there is a lawful basis to do so, including where seeking consent is not appropriate or could place a child at increased risk.
- Staff should never promise a child that they will keep information confidential where this relates to a safeguarding concern. Staff should explain that information may need to be shared with those who can help keep the child safe.
- Information sharing advice for safeguarding practitioners - GOV.UK includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy). The DSL may seek advice from the safeguarding partners through appropriate consultation routes, including discussing anonymised or hypothetical scenarios where appropriate.
- Parents/carers should be informed of concerns about their child where appropriate and where doing so does not increase risk to the child, prejudice a police investigation, or otherwise compromise safeguarding action.
- The DSL should carefully consider whether information relating to a safeguarding concern should be shared with a parent/carer or person with parental responsibility where doing so may place the child at increased risk. This may include situations involving domestic abuse, parental conflict or other safeguarding concerns. Where information is withheld, the decision and rationale must be recorded on the child protection file. The DSL's priority is always the safety and welfare of the child.
- Information may also be shared appropriately within the Trust where this is necessary to support safeguarding oversight, quality assurance or the effective protection of children, in accordance with data protection legislation.
- Confidentiality is also addressed in this policy with respect to record-keeping in Section 14 and allegations of abuse against staff in appendix 3.

## 8. Professional Challenge and Escalation

IFtL recognises that effective safeguarding depends upon a culture where staff feel professional confident to challenge decisions where they believe a child remains at risk. Staff should raise concerns with the DSL in the first instance. Where concerns remain unresolved, staff should follow local safeguarding partnership escalation procedures. Where appropriate, concerns may also be raised with the headteacher, Trust safeguarding team or children's social care directly. No member of staff will suffer detriment for raising safeguarding concerns in good faith.

## 9. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

In this and subsequent sections, references to the DSL should be understood as including the DSL, deputy DSL (DDSL) or other appropriately trained members of the safeguarding team acting under the direction of the DSL.

### 9.1 If a child is suffering or likely to suffer harm, or in immediate danger

Anyone can make a referral to children's social care. Where there is immediate danger, contact the police immediately by calling 999. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

- A DSL must be informed immediately in person wherever possible and without delay where this is not possible.

### 9.2 If a child makes a disclosure to you

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

- Listen carefully and take what they say seriously. Allow them time to talk freely and do not ask leading questions. Only ask questions where necessary to clarify what the child has said.
- Remain calm and avoid expressing shock, disbelief or judgement.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Immediately notify the DSL. Where appropriate, reassure the child about what will happen next and who information will be shared with.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Avoid interpreting, analysing or making assumption about what the child meant.
- Records should be made using the online safeguarding program, CPOMS. This record should be completed as soon as possible and on the same working day wherever practicable. If appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- Staff should not ask children to write down details of what has happened or take photographs of injuries unless specifically requested to do so by appropriate professionals. It is important to note that you must NEVER take a picture of a child's intimate areas. Staff should not delay seeking medical attention or reporting concerns whilst waiting for photographic evidence.
- Children's social care may ask school staff to clarify information. Staff should not undertake investigative questioning. If questioning begins to move beyond clarification and into investigation, this should be discussed with the DSL and children's social care.
- Seek support for yourself, you should be able to debrief with the DSL or an appointed member of staff.

### 9.3 Reporting and Recording a Concern

All staff and volunteers receive guidance on the procedures to report safeguarding concerns upon induction and receive regular updates. All concerns should be recorded on CPOMS as soon as

possible. Where a child is at immediate risk of harm, the DSL must also be informed verbally without delay. Actions logged on CPOMS entries should be created as soon as possible, on the same day and during working hours. Staff should never wait until the next day to report a safeguarding concern. All staff and volunteers will:

- make a written record (see Record Keeping), informing the child that you are doing so.
- pass the information to the DSL and DDSL without delay, either in person (for immediate, priority cases) or using CPOMS (lower-level concerns) depending on the nature of the concern.

All safeguarding concerns must be recorded on CPOMS. The DSL/DDSL will then:

- keep a confidential record of all comments, actions and observations. These records will be filed, kept securely and access will be restricted to only staff authorised by the DSL, headteacher or Trust Head of Safeguarding.
- seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL or the DDSL will contact the parent in the event of a concern, suspicion or disclosure. However, if the DSL or the DDSL believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care/Multi Agency Safeguarding Hub (MASH).
- If the DSL or the DDSL believes that "a child is experiencing or may have already experienced abuse or neglect" or "is at risk of suffering significant harm" either now or in the future, then the school will comply with the procedures of the Local Safeguarding Partnership.

### 9.4 Concerns About Significant Harm or Imminent Danger

Any member of staff that suspects or has evidence of child abuse or is concerned that a child may be at risk of imminent danger, they must notify the DSL or a DDSL immediately and in person. A referral must be made if a child may be suffering or at risk of suffering harm. Whilst the DSL or a DDSL should make the referral, anyone can make a referral to children's social care. If anyone other than the DSL makes a referral to Children's social care or to the police, they should inform the DSL as soon as possible.

### 9.5 Concerns Below the Threshold for Significant Harm and No Imminent Danger

Staff should log concerns on CPOMS, at the earliest opportunity, providing sufficient information and context for the DSL/DDSL to assess the information. The DSL will consider the information available and determine the most appropriate safeguarding response. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. All concerns, discussions and decisions will be recorded in writing. The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the school's own pastoral support processes.
- an Early Help Assessment; or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

The below provides an overview of how academies will respond to specific safeguarding issues. The list is not exhaustive and is designed to complement the contents of Keeping Children Safe in Education (2026). Staff should follow the procedures outlined above when responding to, recording and reporting the specific safeguarding issues detailed below. The response of DSLs and DDSLs

will always be guided by Keeping Children Safe in Education (2026) and multi-agency policies and procedures implemented by the safeguarding partnership

### 9.6 If you discover that FGM has taken place or a pupil is at risk of FGM

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

**Any teacher** who either:

- Is informed by a girl under eighteen that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under eighteen and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

under FGM duty to refer guidance, are required to report this immediately to the Police. They also have a duty to report to the DSL, who will be involved in the follow up process for the child.

A joint referral involving the teacher and the DSL is preferable, ensuring that guidance in KCSIE and the FGM duty are implemented. CSC will also be involved.

- Milton Keynes – a call to MASH to safeguard the child and then report via the police non-emergency route unless immediate risk requires 999
- Northants – the lead for FGM, sits within the MASH team, so a call to MASH is required, ensure that you are clear that it is a report under the FGM mandatory reporting duty.

In both cases you will be asked for details of the child, any other siblings, make-up of the family, addresses and contact details. Details of the DSL, the school and what action has been taken to safeguard the child.

Consideration must be made on whether there is a flight risk. The school nurse may also be helpful, as they are trained to discuss this issue with parents.

A number will be given that needs to be recorded on the front of the child's child protection file.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged eighteen or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

The DSL will also complete the FGM screening tool which gives further advice and guidance.

- See further information and a risk assessment tool here.

### 9.7 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

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

**Milton Keynes MASH on 01908 253169**

**Northamptonshire MASH on 0300 126 7000**

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

**Milton Keynes schools:** Make a referral to the Milton Keynes Multi Agency Referral Hub (MASH) directly on 01908 253169, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

**Corby schools:** Make a referral to the Northamptonshire Multi Agency Referral Hub (MASH) directly on 0300 126 7000, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

MASH may also be consulted for advice and guidance.

### 9.8 Early help

**Early help and Vulnerable Children**

All staff should be prepared to identify children who may benefit from early help. Early help is not a lower-level safeguarding response; it is an important part of safeguarding practice. Early help involves providing timely, coordinated support to children and families as soon as problems emerge, to improve outcomes and prevent needs escalating. If early help is appropriate, the DSL or DDSL will generally lead on involving the child and family and liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL or DDSL any ongoing/escalating concerns so that consideration can be given to a referral to children's social care if the child's situation does not appear to be improving.

We recognise that any child can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a child.

- 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 (EHCP)).
- has a mental health need.
- is a young carer.
- is bereaved.
- 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 care or from home.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised.

- is questioning their gender and may require safeguarding, pastoral or wellbeing support depending on their individual circumstances.
- is viewing problematic and/or inappropriate online content or developing inappropriate relationships online.
- has a parent or carer in custody; family member in prison or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol, adult mental health issues and domestic abuse.
- are affected by domestic abuse (including as victims under the Domestic Abuse Act definition).
- is misusing drugs or alcohol themselves.
- is suffering from mental ill health.
- are experiencing homelessness or housing instability
- has returned home to their family from care.
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child, living within a kinship care arrangement, or a Special Guardianship Order; and
- is absent from education, or persistently absent from school, or not in receipt of full-time education. This also includes unexplainable persistent absences from education.
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.

The DSL will maintain a list of students who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these students are monitored closely and supported to achieve the best possible outcomes. Many of these children will be looked after children, or previously looked after children, or have special educational needs or disabilities.

- Early Help is available through Milton Keynes and Northamptonshire. The MASH team can support with additional support alongside the Targeted Early Intervention team in Milton Keynes.
- An Early Help toolkit is available, and the safeguarding team will liaise with MASH.
- Milton Keynes Multi Agency Safeguarding Hub (MASH) - Milton Keynes Council (milton-keynes.gov.uk)
- Report a concern or request support | Northampton Children's Trust
- All schools in IFtL are committed to supporting and safeguarding all pupils. Early Help may also take the form of School Based Provision where staff support specific areas of need.
- Early Help will often decrease the need for formal statutory intervention later on; it is better to provide support at an early stage than get to the point where there must be statutory intervention by CSC.

Where appropriate, early help and safeguarding responses will consider the role of the wider family network in supporting the child, including kinship care arrangements, in line with Working Together to Safeguard Children (2026).

### 9.9 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. The school will be guided by MASH as to the appropriate outcome e.g., complete an Early Help Assessment (EHA) or refer to a relevant specialist agency.

All Child Protection records, including referrals, will be logged on CPOMS. The protocols as outlined in the Data Protection Policy must be followed. The local authority will decide within 1 working day of a referral about what course of action to take and will inform the referrer of the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. All escalations must be recorded on CPOMS. The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Consent is required before a person receives support through the Channel programme. Contact details for the MASH can be found in Section 1 of this policy.

### 9.10 If you have concerns about extremism/radicalisation

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. It is important to note that consent will be required before support can be delivered through Channel panel.
The DSL will liaise with the person who identified the concern and ensure appropriate information is shared.

Milton Keynes- Phone the MASH team to consider the immediate safety of the child. The DSL will then contact police, using the 101 number and ask to report under the PREVENT Duty. They will be asked for further details around the concern.

Northamptonshire- Phone MASH team to consider the immediate safety of the child. The Prevent Lead sits within the MASH team, so you will be transferred to talk directly with them. You will be asked for further details around the concern.

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

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related
- Further information is also available within the PREVENT duty guidance (https://www.gov.uk/government/publications/prevent-duty-guidance) and on the Act Early website (ACT Early | Prevent radicalisation), this gives advice and guidance for professionals and parents.

### 9.11 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. However, mental health concerns may also arise independently of safeguarding concerns.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

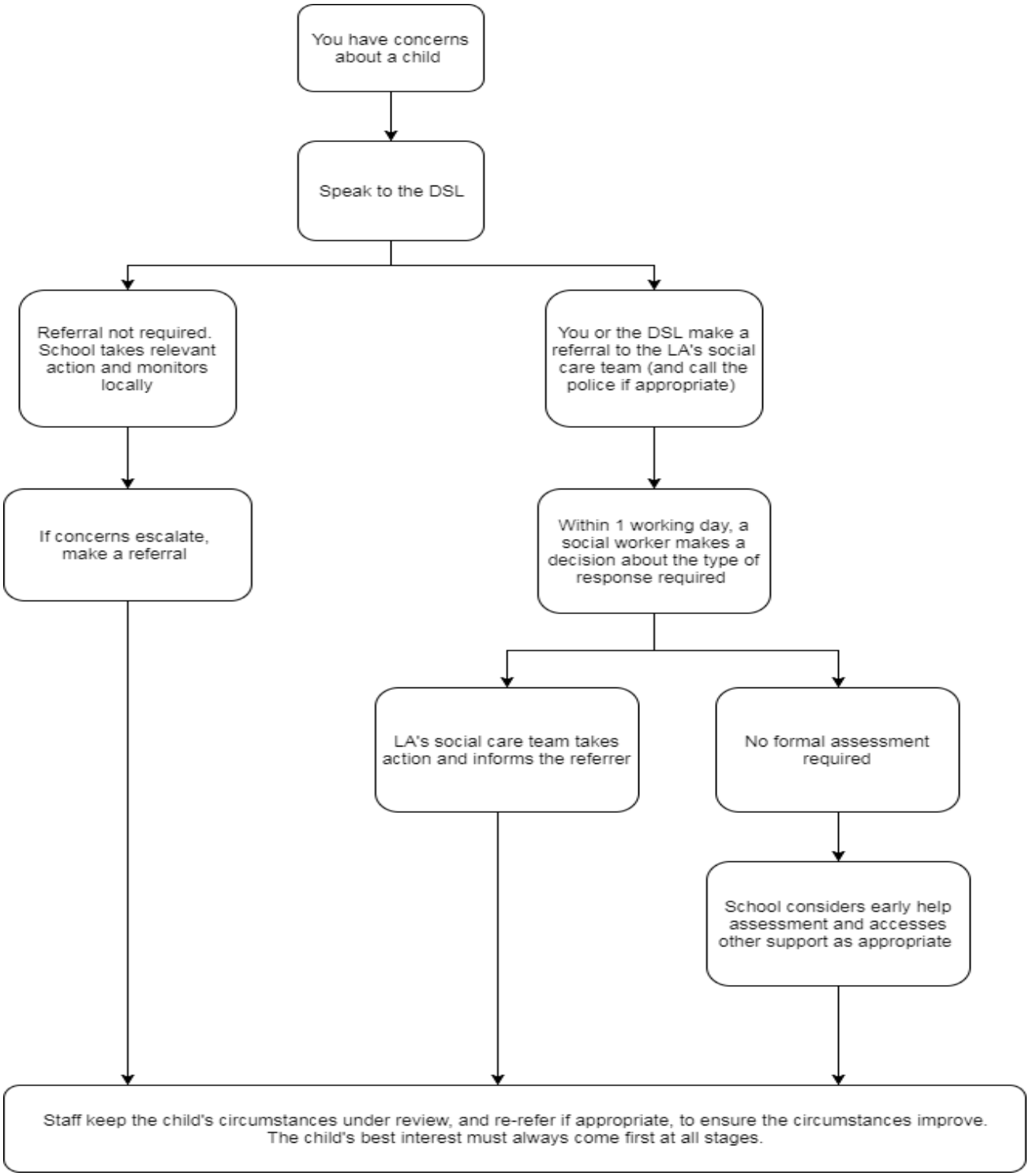
If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

All schools work with other schools within the Inspiring Futures through Learning trust to bring experts in positive mental health together.

More information is available via the Department for Education guidance on mental health and behaviour in schools.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)




## 9.12 Concerns about a staff member, supply teacher, volunteer or contractor

At IFtL we pride ourselves on staff having a clear concise understanding of what amounts to 'good staff conduct' (as detailed in the staff code of conduct). This enables us to create an environment in which children feel safe and understand the behaviour expectations of both themselves and of staff.

Concerns about adults working in or on behalf of the school fall into two categories:

**Concerns or allegations that may meet the harm threshold**

This includes concerns/allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school. This could be where it is alleged that anyone working in the school has:

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

**Low-level concerns**

This includes concerns that do not meet the harm threshold and are considered low level concerns. This includes showing favouritism towards a child, shouting at a child or not following the code of conduct.

In both strands, if you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) or a professional in another agency, is posing a risk of harm to children, speak to the **headteacher** as soon as possible.

If the concerns/allegations are about the headteacher, then speak to the chair of governors and the Trust DSL.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. The headteacher will then follow the procedures set out in appendix 3, if appropriate.

Schools and colleges 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 and colleges should follow their safeguarding policies and procedures, including informing the LADO.

If the concerns/allegations are about the headteacher, speak to the Chair of Governors or the local authority designated officer /Designated Officer (LADO/DO),

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer/Designated Officer (LADO/DO).

The LADO/DO will advise, the school if they need to inform Ofsted/ TRA or DBS of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

The LADO/DO will also advise on whether the person can continue working with children, should be moved to other work or must be suspended during the investigation.

If a concern is for an adult within the IFtL core team, TMA ITT then the concern should be shared with Victoria Blackmore and Michelle Gardner (for MK ITT). The IFtL reporting form should be completed in this instance.

The IFtL DSL should be informed that a concern has been raised by contacting them immediately. *[See contact information at the beginning of this policy].*

If there are any concerns about any of the people named above, including the CEO, then these concerns are to be shared with the chair of Trustees, Marilyn Hubbard (mhubbard@IFtL.co.uk).

It is essential that these reports must be made immediately.

Low level concerns will also be shared with the LADO/DO as part of the investigation, they will also be informed of any other work or volunteering that the person completes which involves contact with children. There will also be consideration of the safety of their own children made.

Investigation will be undertaken quickly and resolved as soon as possible. Criminal referrals may take much longer as they are dependent on the Crown Prosecution Service.

### 9.13 Allegations of abuse made against other pupils (Child on Child Abuse)

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. The wishes, feelings, safety and ongoing support needs of the victim will be central to all decision making.

We recognise that child-on-child abuse can affect any child. However, research indicates that some forms of abuse disproportionately affect girls, while boys can also be victims and girls can be perpetrators. Nonetheless, schools recognise that all children can be victims and perpetrators of child-on-child abuse.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

See appendix 4 for more information about child-on-child abuse.

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

There is a legal requirement that the school must log any concerns, complete risk assessments for victim, perpetrator, other children and staff. All actions must be recorded, any actions to ensure safety, any changes made to policies and procedures and any resolution.

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

- The priority is to ensure the safety of all children involved.
- You must record (log) the allegation and tell the DSL, but do not investigate it

- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence (as defined in when-to-call-the-police--guidance-for-schools-and-colleges.pdf)
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected including staff) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The DSL will also consider if referrals are required for contraceptive advice, STI testing, healthy relationship advice and counselling.
- The Governing body will consider if policies and procedures need to be adapted to minimise the risk of reoccurrence.

**Creating a supportive environment in school where children are encouraged to report and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour, healthy relationships and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously and keep them informed about what is happening
- Recognition that it is more likely that girls will be victims and boys' perpetrators although it is important to remember boys can be victims and girls perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously
- Ensure staff are trained to understand:
- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it will happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation

- A child's behaviour might indicate that something is wrong
- Children may not recognise the abuse
- Children may try to protect the abuser and see them as a real girlfriend/boyfriend
- Children may be frightened, feel humiliated and ashamed or may have been threatened.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

### 9.14 Sharing of nudes and semi-nudes

**Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (previously known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) to view or share the imagery or undertake investigative questioning about the content of the imagery
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

**Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response

- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services (Report Remove: Remove a nude image shared online | Childline)
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved unless it places the child at increased risk))

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- The DSL has reason to believe that other young people are at risk, making it in the public interest.

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

**Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately. If the DSL is any doubt, then a phone consultation will take place with MASH.

**Informing parents/carers**

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

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through local neighbourhood police or by dialing 101. Reference should also be made to the guidance NPCC 'When to call the Police' (when-to-call-the-police--guidance-for-schools-and-colleges.pdf)

**Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS. The record-keeping arrangements set out in section 14 of this policy

also apply to recording these incidents. Records of this will also be made on the online safeguarding system. The DSL is required to review these records regularly, checking for common themes, escalation of cases or links between individual events.

**Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex and health education (RSHE) and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Pupils will also be taught how to remove these images and how to report concerns directly.

In line with KCSIE 2026, we understand and value the importance of the role all our schools can play in **preventative education** and the importance of an age-appropriate planned programme of relationships, sex and health education (paragraph 130) and that we need to ensure we education our children and families about harmful online challenges and online hoaxes (paragraph 132). Moreover, as highlighted in the paragraph 139, we will ensure we communicate with parents/ carers about children's access to online sites when away from school as well as when in school.

### 9.15 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

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

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure pupils understand that this is not their fault. Staff will be reminded of the need to be non-judgemental
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils will be able to report concerns and speak to any member of staff across the school

- Give alternative reporting mechanisms i.e.  NCA's CEOP safety centre.
- Younger pupils will be taught to identify trusted adults on 'helping hands'
- Pupils will be able to speak to staff directly and use 'worry monsters' to write concerns down
- Pupils in KS2 and KS3 may wish to speak with form tutors as well as the wider staff
- Pupils will be made aware of the reporting systems and processes through discussion the relationship/sex education curriculum
- All disclosures and concerns will be dealt with respectfully and pupils will be taken seriously, creating a culture of trust

Schools should create safe spaces within school and develop trusted staff, to support children to feel confident in raising concerns.

## 10. Online safety and the use of mobile technology

We recognise that online safety is an integral part of safeguarding and that technology can create opportunities for abuse, exploitation and harm, both within and outside school.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which may include mobile phones or smart watches)
- Set clear guidelines for the use of mobile phones and other mobile devices for the whole school community (when using devices within school or at home)
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Have effective filtering and monitoring systems in place which meet the DfE Filtering and Monitoring Standards, with appropriate escalation processes for safeguarding concerns identified through these systems.

Note: Filtering and monitoring systems support safeguarding but do not replace active supervision, professional curiosity and staff vigilance.

### 10.1 The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, harmful online challenges, hoaxes, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users, including pressure from peers, adults posing as children or young adults with the intention of grooming or exploiting children for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of

nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### 10.2 Artificial intelligence and emerging technologies

The Trust recognises that emerging technologies, including generative artificial intelligence, create both opportunities and safeguarding challenges. Schools will ensure that staff and pupils understand the safe, ethical and responsible use of technology, including awareness of risks associated with AI-generated content, misinformation, deepfakes, privacy, online abuse and exploitation.

Staff should be aware that children may use generative artificial intelligence tools. While AI can support learning and creativity, it may also be misused to create or share harmful content, including inappropriate images, misinformation or content that may contribute to online abuse or exploitation. Any safeguarding concerns arising from the use of AI will be managed in accordance with this policy.

### 10.3 To meet our aims and address the risks above we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online including harmful online challenges
- How to report any incidents of online-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use, filtering and monitoring processes and online safeguarding issues including online-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year. Staff will understand their role in identifying and reporting concerns arising from filtering and monitoring systems, including alerts, blocked content and patterns of concerning online behaviour. Staff should not attempt to investigate concerns identified through filtering and monitoring systems themselves but should report them through safeguarding procedures.
- Staff must be aware of risks associated with harmful online challenges, hoaxes and trends, and understand how to respond appropriately.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety and alert them to any emerging concerns around online harmful challenges, content, apps, games and platforms.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff may bring personal phones to school; however, use should be limited to designated non-contact times and in line with school expectations.
- Staff will not share personal numbers or email addresses with parents of children.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Staff should not use personal phones to contact parents or pupils, only school phones should be used. In the event of an emergency when a personal phone has to be used, staff will ensure they withhold the number.
- Staff must comply with school expectations regarding personal devices, including smart watches and devices capable of recording images or audio.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Staff and pupils are expected to maintain appropriate professional boundaries when using online platforms, including consideration of surroundings, backgrounds, clothing and behaviour during online interactions.
- Any recording of pupils must have a clear educational or safeguarding purpose, appropriate consent where required, and comply with the school's data protection and photography policies.
- All online sessions should be authorised beforehand, and the DSL should have the ability to check on any session without warning.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Ensure staff, pupils and parents/carers are aware of the school's power to search, screen and confiscate items, including mobile phones, in line with guidance: DfE's guidance on searching, screening and confiscation
- The DSL will liaise with the senior leadership team, and governing body to ensure that filtering and monitoring arrangements are effective and that safeguarding concerns identified through these systems are reviewed and acted upon appropriately.
- The filtering system should be monitored; it should not stop genuine research around topics for pupils but must block potentially harmful information.
- We ensure that all school devices offer appropriate filtering and monitoring of online content and that any harmful content is logged and responded to appropriately and proportionately in line with the DfE's 2023 filtering and monitoring standards for schools (please refer to the online safety policy)
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community. This review will include consideration of filtering and monitoring effectiveness, online safety education, emerging risks, incidents and actions required.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and behaviour policy, which you can find on our website.

As IFtL schools use 1:1 Devices, online safety arrangements take account of the additional safeguarding considerations associates with increased access to technology, including the responsible use of artificial intelligence.

We recognise that children's online lives often extend beyond school. We will work with parents and carers to support understanding of online risks, including harmful content, online challenges, social media, gaming and emerging technologies. We will provide advice and guidance to help parents/carers support children's online safety.

## 11. Notifying parents or carers

Where appropriate, we will work in partnership with parents and carers and discuss concerns about a child's welfare with them, unless doing so would place the child at increased risk of harm, prejudice a police investigation, or compromise any safeguarding enquiries. Decisions not to inform parents will always be recorded together with the rationale. The DSL will normally lead this communication where there is a safeguarding concern, disclosure or allegation.

Other staff will only discuss safeguarding concerns with parents or carers following consultation with the DSL. Staff should not make decisions about sharing safeguarding information with parents/carers or provide assurances about outcomes before the safeguarding response has been agreed.

If we believe that notifying parents or carers may increase risk to the child or impact on a safeguarding enquiry, we will seek advice from children's social care and/or the police before doing so.

In cases of alleged child-on-child abuse, we will consider informing the parents or carers of all children involved. The timing and approach will be determined by the DSL, taking into account the circumstances of the case, the views and wishes of the children involved, and advice from external agencies where appropriate.

Parents/carers will be provided with appropriate information about how the school is managing the safeguarding concern. Where appropriate, they will be advised not to contact other children involved or their families directly, as this may impact on the safeguarding arrangements, the wellbeing of those involved or any ongoing enquiries.

## 12. Pupils with special educational needs, disabilities or health issues

We recognise that children with special educational needs, disabilities or health conditions may face additional safeguarding challenges and may require additional support to recognise, communicate and report concerns. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as changes in behaviour, mood or injuries, relate solely to the child's condition without further exploration. Staff must always explore changes in presentation, behaviour or communication.
- Children may experience increased risk of isolation, bullying or exploitation, including prejudice-based and discriminatory bullying.
- Pupils with SEND or certain health conditions may be disproportionately impacted by behaviours such as bullying, exploitation or abuse, and may not aways display obvious signs of harm.
- Communication barriers, differences in communication styles, or difficulties in understanding and reporting concerns.
- Children may have difficulty understanding that what they are experiencing is abuse or may not recognise behaviours as harmful, particularly where those experiences have been normalised.

Staff should consider the individual needs of each child and make appropriate adjustments to support communication, disclosure and participation in safeguarding processes. This may include making reasonable adjustments to communication methods, providing additional time, involving

trusted adults where appropriate, and ensuring that children with SEND have equal opportunities to share their views and feelings.

Staff should remain professionally curious and avoid assuming that a child's presentation, behaviour or communication difficulties are solely attributable to their SEND or health condition.

## 13. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where a child has a social worker, the DSL should be involved in relevant safeguarding discussions and decision-making, ensuring that safeguarding information informs support and provision for the child. Schools will work proactively with social workers to improve attendance, educational outcomes and safeguarding.

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

- Responding to unauthorised absence or children absent from education where there are known safeguarding risks
- The provision of pastoral and/or academic support
- The need to maintain appropriate contact with the child and family and ensure effective communication with professionals involved in supporting the child.

The DSL and safeguarding team understand the importance of having regular opportunities to see and speak with the child, including, where appropriate, without parents or carers present. This will always be undertaken in a way that maintains appropriate safeguarding arrangements, for example ensuring the child and staff member remain visible to others.

## 14. Looked-after Children, Previously Looked-after Children, and Children in Kinship Care Arrangements

We are committed to ensuring that all staff have the skills, knowledge and understanding necessary to safeguard children who may require additional support due to their care arrangements, including:

- Children who are looked after by a local authority
- Children who were previously looked after but are now adopted or subject to a Special Guardianship Order or Child Arrangements Order
- Children being raised within kinship care arrangements, whether formally arranged through a local authority or informally through family or friends

Our approach includes ensuring:

- Relevant staff have appropriate information about a child's care arrangement and any support or safeguarding considerations, shared on a need-to-know basis
- Where applicable, the DSL maintains accurate and up-to-date records of the child's social worker, Virtual School Head (VSH), and any other professionals involved

- The DSL or a deputy maintains appropriate communication with the VSH, carers, family members and other professionals involved in supporting the child, where relevant.

### 14.1 Designated Teacher

We have appointed a Designated Teacher (see contact details at the start of this policy), in line with statutory guidance, who is responsible for promoting the educational achievement of looked-after and previously looked-after children.

The Designated Teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their duties, the Designated Teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns are quickly and effectively responded to
- Collaborate with Virtual School Heads (VSH) to identify how Pupil Premium Plus funding and other resources can be used to support progress
- Monitor progress, attainment, attendance and wellbeing, and ensure that Personal Education Plans (PEPs) are in place and reviewed
- Identify and respond to any additional support or safeguarding needs for children in kinship care arrangements, recognising that arrangements can vary and may have different implications for the child's wellbeing,
- Seek guidance from the local authority where care arrangements are unclear or where concerns arise about a child's welfare.

Staff should be aware that some kinship care arrangements may not involve formal arrangements or ongoing local authority oversight. Staff should remain professionally curious and raise any concerns about a child's living arrangements, care or welfare with the DSL.

## 15. Complaints and concerns about school safeguarding policies

### 15.1 Complaints against staff

Concerns or allegations about staff that may meet the harm threshold will be managed in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

Concerns that meet the harm threshold will be taken seriously and responded to promptly. The school will work with the LADO/Designated Officer and other relevant agencies where appropriate to ensure concerns are managed in line with statutory guidance.

Concerns that do not meet the harm threshold will be managed through the school's low-level concerns procedures, in line with KCSIE.

### 15.2 Whistleblowing

All schools in our IFtL Trust follow the Trust-wide whistle-blowing policy, which covers concerns regarding the way the school safeguards pupils, including poor or unsafe practice, concerns about colleagues, or potential failures in safeguarding arrangements. The full whistleblowing policy can be accessed here.

There is a facility for external reporting if staff do not feel confident raising concerns internally. All staff are made aware of this as part of their induction and reminded of this regularly.

## 16. Record keeping

We will hold records in line with our Trust records retention schedule and relevant statutory guidance.

All safeguarding concerns, including low level concerns, discussions, decisions made and the reasons for those decisions must be recorded on the school's digital safeguarding system, CPOMs. If staff are unsure whether something should be recorded, they should discuss this with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of actions taken, including who was responsible and any support or plans put in place
- Information shared with other agencies and any referrals made or decisions not to refer, including the rationale
- Details of decisions, decisions, professional challenge and outcomes
- How concerns were followed up, resolved or closed, including any challenge to closure decisions

Safeguarding concerns and referrals will be recorded within the child's safeguarding record where appropriate. This will include a chronology of significant events, which is regularly reviewed by the DSL to identify patterns, themes, escalation or additional support needs. Written records, notes, and body maps will be scanned and added to the file where appropriate.

Safeguarding records will be stored securely, with access restricted to those who have a legitimate professional need to know. Information will only be shared in accordance with data protection legislation and safeguarding requirements.

Safeguarding records relating to individual children will be retained in accordance with the Trust records retention schedule and relevant statutory guidance.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is transferred securely and separately from the main pupil file without delay. Where concerns are significant or complex, and/or children's social care are involved, the DSL will speak with the DSL of the receiving school to share relevant information and enable appropriate safeguarding arrangements to be put in place.

Where there are safeguarding concerns relating to sexual violence, sexual harassment, exploitation, radicalisation or other significant risks, the receiving school or college should be made aware of the concerns prior to the child starting, where appropriate, to allow time for suitable safeguarding arrangements to be considered.

Confirmation of transfer will be retained in accordance with the Trust's record keeping procedures. Where digital safeguarding systems such as CPOMs are used, records will be transferred securely through the system and confirmation of transfer retained.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 17. Training

### 17.1 All staff

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

This training will be regularly updated and will:

- Be integrated into the Trust's wider safeguarding approach and reflect the safeguarding priorities, risks and needs of the school community
- Focus on the contextual needs of the school and recent safeguarding trends
- Include consideration of contextual safeguarding (recognising that abuse may occur outside the family home, including online and within peer groups, schools and the wider community) and extra familial harms relevant to the children and communities they work with
- Reflect the expectations set out in the Teachers' Standards where relevant, including that staff understand how to:
    - Manage behaviour effectively to ensure a good and safe environment
    - understand the individual needs and vulnerabilities of pupils
    - respond appropriately to disclosures
    - report safeguarding concerns and allegations against staff

All staff will receive Prevent awareness training as part of safeguarding training, enabling them to identify children who may be at risk of being drawn into terrorism and challenge extremist ideas.

All staff will have an awareness of Female Genital Mutilation (FGM), including the duty to report, and be able to identify signs that it may have happened or that a child may be at risk.

All staff working with children must understand the risks associated with exploitation, including child criminal exploitation (CCE) and child sexual exploitation (CSE), and recognise indicators that a child may be at risk.

Staff will receive regular safeguarding and child protection updates, including online safety, filtering and monitoring updates. This will ensure staff understand their responsibilities in identifying, reporting and responding to concerns arising from filtering and monitoring systems.

The ethos within our schools is that safeguarding is embedded across all activities, lessons and extra-curricular provision. We promote a culture where all staff understand their responsibility to identify, respond and report safeguarding concerns,

Volunteers will receive appropriate safeguarding induction training, ensuring they know what to look for and how to report concerns. Volunteers will only undertake activities appropriate to their role and will be appropriately supervised unless the relevant safeguarding checks and arrangements allow otherwise.

### 17.2 The DSL and deputy and additional designated safeguarding officers

The DSL, deputy DSLs and additional designated safeguarding officers will undertake formal safeguarding and child protection training which is updated at least every two years.

In between formal training, they will update their knowledge and skills regularly and at least annually through activities such as safeguarding updates, DSL networks, professional reading and multi-agency engagement.

They will also undertake relevant training in areas including SEN, online safety, Prevent awareness, FGM and multi-agency safeguarding practice.

They will identify any additional training needs or gaps in knowledge to ensure they can respond effectively to emerging safeguarding concerns.

### 17.3 Governors/Trustees

All governors and trustees will receive safeguarding induction training, including their responsibility to challenge and scrutinise safeguarding arrangements.

They will receive annual safeguarding updates to ensure they have the knowledge and information required to fulfil their responsibilities.

The chair of governors and safeguarding link governor will receive additional training appropriate to their roles, including their responsibilities for oversight, challenge and monitoring.

As the chair of governors may be required to act as the case manager in relation to allegations against the headteacher, they will receive appropriate training to undertake this role. Additional support will be provided by the Trust where required.

### 17.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have completed safer recruitment training. This training will be refreshed in accordance with Trust requirements and good practice.

IFtL schools ensure that safer recruitment requirements are met and that all required pre-employment is undertaken. Any required risk assessments will be completed and retained appropriately. All required checks are recorded on the Single Central Record (SCR)

See appendix 2 of this policy for more information about safer recruitment procedures.

### 17.5 Staff who have contact with pupils and families

Members of the safeguarding team and other identified staff with significant safeguarding responsibilities or who work regularly with children and families requiring additional support will receive appropriate supervision. This will provide support, coaching and opportunities for reflective discussion, promote the interests of children and support staff wellbeing.

## 18. Contextual and additional safeguarding information for Ashbrook School.

### 18.1 Our safeguarding context

Ashbrook school is a 180-place infant school. The main areas for safeguarding focus in school are around (but not limited to) parenting, physical abuse, attendance and punctuality, unexplained injuries. The school promotes and celebrates the diversity within the community through assemblies and a diverse curriculum. This is taken further through discussions with pupil leaders, engagement from parents in coffee mornings and the project work. The children, staff and families understand and regularly reflect on the school, Trust and British values and the need to promote a respect of differences in line of British values.

There have been no concerns raised with regards to radicalization, however due to the young age of the children attending Holmwood staff and school leaders are aware of the potential for children to be exposed to news, particularly conflicts between Russia/Ukraine or Israel/Gaza/Palestine. Healthy Respectful Relationships and British Values are therefore reflected on and discussed during assemblies and Jigsaw (PSHE lessons).

The school agreed approach to supporting children and giving them a voice is through 'The Colour Monsters' and staff use this system to support children in communicating any worries they may have.

The school has a robust attendance policy. The main attendance concerns we see are term time holidays and regular illness.

The processes for visitors to Ashbrook school are as follows: Office Team (discuss lanyards, signing in and out systems).

All visitors are required to sign in on arrival, reception should be made aware of planned visitors beforehand.

Visitors must be collected by the relevant staff and should be escorted to the area where they will be working or seeing pupils.

A copy of the school Child Protection Policy will be available, and the attention of the visitor will be drawn to what they need to do if they have a concern, the names of the DSL and safeguarding team and how to make a report.

All staff and visitors are required to wear a lanyard, which indicates the level of checks that have been undertaken on the individual and checks if they are able to work in regulated activity, supervised or unsupervised.

All staff are aware that anyone not wearing a lanyard must be challenged (if safe to do so) and escorted back to the reception desk. They are aware of what the different lanyards mean and the requirement to never leave someone unsupervised unless they have the relevant DBS check in place.

Students are also aware of the meaning of the lanyards.

### 18.2 Prevent and extremism considerations

The school has considered local risks relating to radicalisation and extremism. This includes consideration of local intelligence, pupil demographics, community factors and any emerging concerns. There have been no concerns raised with regards to radicalization in the local area.

### 18.3 Visitors and site security

The school has appropriate arrangements in place to ensure the safety of pupils when visitors, contractors and other adults are on site.

All visitors are required to sign in on arrival and reception staff maintain oversight of planned and unexpected visitors.

Visitors will be issued with an appropriate visitors badge/lanyard and must be escorted by a member of staff unless the appropriate safeguarding checks have been completed and arrangements are in place to allow independent access.

Visitors will be provided with safeguarding information, including the school's child protection policy, the identity of the DSL and safeguarding team, and the process for reporting any concerns.

All staff understand that anyone on site without appropriate identification should be challenged where it is safe to do so and reported to reception or a member of the safeguarding team.

All staff and visitors are required to wear a lanyard in accordance with the schools' visitor management procedures. Lanyards indicate the level of safeguarding checks completed and the level of access or supervision arrangements that apply.

Contractors and agency staff working on site will follow the school's safeguarding arrangements. Where contractors are undertaking regulated activity, the appropriate checks will be confirmed before they work unsupervised with pupils.

## 19. Monitoring arrangements

This policy will be reviewed **annually** by the IFtL Head of Safeguarding and IFtL Deputy DSL, or sooner where there are changes to legislation, statutory guidance or local safeguarding procedures.

**Each headteacher is responsible for ensuring that the policy is implemented effectively within their school and that the school-specific contextual safeguarding information reflects the needs and safeguarding priorities of their community, while remaining aligned with the Trust-wide safeguarding framework and procedures.**

The Board of Trustees provides strategic oversight of safeguarding across IFtL and is responsible for approving this policy annually, ensuring that it remains compliant with current legislation, statutory guidance and best practice. Trustees will receive appropriate assurance that effective safeguarding arrangements are in place across the Trust, including appropriate policies, procedures, training, recording systems and safeguarding leadership structures.

Regular safeguarding audits and quality assurance activities will take place to assess the effectiveness of safeguarding arrangements and identify areas for improvement. These activities form part of the Trust safeguarding assurance process.

Each school will complete an annual safeguarding audit/self-assessment in line with statutory requirements and local safeguarding partnership arrangements. This may include completion of Section 175/157 safeguarding assurance returns where required. Findings will be reviewed internally and shared with safeguarding partners where appropriate.

## 20. Use of Restrictive Intervention (including reasonable force)

The Trust recognises that, in exceptional circumstances and where permitted by law, staff may need to use reasonable force or restrictive intervention to prevent serious harm to a child, themselves or others, or to prevent significant damage to property.

Any use of restrictive intervention will always be:

- Used only when necessary and were no safer alternative is available

- Reasonable, proportionate and appropriate to the circumstances
- Used for the shortest possible time and stopped as soon as the risk reduces
- Never used as a form of punishment

Where restrictive intervention or reasonable force is used:

- Any use of restrictive intervention or reasonable force will be recorded in line with statutory guidance and the school's procedures
- Parents/carers will normally be informed as soon as practicable, unless doing so would place a child at increased risk or compromise safeguarding action
- Incidents will be reviewed by senior leaders to ensure that the intervention was appropriate, proportionate and that any learning is identified.
- Pupils will receive appropriate support following any restrictive intervention, and learning from incidents will inform future risk assessments and support planning.

Further information regarding the use of restrictive intervention and reasonable force is set out within the school's behaviour policy.

## 21. Links with other policies (school based and trust wide)

Child protection and safeguarding is a thread that runs through all aspects of school life and links with a range of school and Trust policies and procedures.

This policy should be read alongside the following policies:

- Anti-Bullying Policy
- Attendance Policy
- Behaviour Policy
- Complaints Procedure Policy
- Code of Conduct for Staff Policy
- Data Breach Policy
- Data Protection Policy
- Equality Statement Objectives Policy
- First Aid and Medicines Policy
- Health and Safety Policy
- Managing Allegations Against Staff Procedure Policy
- Online Safety Policy
- Records Management Policy Part 1, Records Management Policy Part 2
- Relationships and Sex Education (RSE) Policy
- Risk Management Policy
- Safer Recruitment Policy
- Whistleblowing Policy

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

## Appendix 1: types of abuse

**Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. Children may experience abuse in different contexts, including within the home, within peer relationships, online or within the wider community.

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a 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
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school policy and procedures for dealing with it.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Exploitation (Child criminal exploitation CCE and Child Sexual Exploitation CSE):** Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance.

## Appendix 2: safer recruitment and DBS checks – policy and procedures

### Recruitment and selection process

To ensure that we recruit suitable people and deter unsuitable individuals from applying, those involved in recruitment and selection for roles involving children will receive appropriate safer recruitment training.

We are committed to safeguarding and promoting the welfare of children throughout the recruitment and employment process. Our recruitment procedures are designed to ensure that appropriate checks are completed and that decisions are made with safeguarding as a priority.

### Advertising

When advertising roles we will make clear:

- Our commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken as part of the recruitment process
- The safeguarding requirements and responsibilities of the role, including the extent to which the role involves contact with children and whether this may constitute regulated activity
- Whether the role is exempt from the Rehabilitation of Offenders Act 1974 and associated exceptions, where relevant
- The requirement for applicants to provide appropriate original documentation to verify their identity, right to work and qualifications where required
- That online searches may be undertaken as part of the due diligence checks on shortlisted candidates

### Applications

Our application process will:

- Include a statement confirming that it is an offence for an individual who is barred from regulated activity relating to children to apply for a role involving regulated activity
- Include information about our child protection and safeguarding policies
- Include information regarding the requirements for shortlisted candidates to complete relevant criminal record self-declarations
- Inform applicants that online searches may be undertaken as part of the recruitment process and that any relevant information may be explored during the recruitment process.

### Shortlisting

Our shortlisting process will involve at least two people and will:

- Consider the information provided within the application form
- Explore any gaps in employment history and reasons provided
- Consider inconsistencies or discrepancies in formation provided
- Consider information obtained through any appropriate online searches undertaken as part of due diligence checks

Once candidates have been shortlisted, they will be asked to complete a self-declaration confirming whether there is any information that may affect their suitability to work with children.

This may include:

- Criminal history information where relevant
- Whether they are included on the children's barred list
- Whether they are prohibited from teaching, where applicable
- Relevant overseas criminal information, where required
- Any other information that may affect their suitability to work with children

Candidates will be asked to confirm that the information provided is accurate and complete and that they will inform the school of any changes in circumstances that may affect their suitability to work with children.

**References and employment history**

References will be obtained as part of the recruitment process and must provide sufficient information to support safe recruitment decisions.

When obtaining references, we will:

- Obtain references directly from referees
- Not accept open references
- Verify information where appropriate
- Seek references from appropriate professional sources, including the candidate's current or most recent employer where possible
- Explore any concerns or discrepancies identified within references with the candidate and/or referee
- Resolve any safeguarding concerns before an appointment is confirmed

References will seek information relevant to safeguarding, including confirmation of the candidate's suitability to work with children and details of any concerns relating to their conduct or capability where appropriate.

**Interview and selection**

Interviews will assess each candidate's suitability to work with children, as well as their suitability for the role.

During the interview process we will:

- Explore any gaps in employment history or frequent changes in employment or location
- Discuss any inconsistencies identified through the application, references or online searches
- Assess the candidate's motivation to work with children
- Evaluate the candidate's understanding of safeguarding and child protection responsibilities appropriate to the role
- Record the recruitment decision and rationale, including interview notes and scoring where applicable

**Pre-appointment checks**

All offers of employment are conditional upon satisfactory completion of the required pre-employment checks.

The school will record the required information on the Single Central Record (SCR) in accordance with statutory requirements. Copies of relevant documents will be retained on personnel files in line with data protection legislation and the school's retention schedule.

Before employment commences, we will complete the appropriate checks, including, where applicable:

- Verification of the individual's identity
- Verification of their right to work in the UK
- Verification of professional qualifications where required for the role
- An Enhanced Disclosure and Barring Service (DBS) certificate
- A children's barred list check where the role involves regulated activity
- A prohibition from teaching check where applicable
- A prohibition from management (Section 128) check where required
- Overseas checks where an individual has lived or worked outside the UK and such checks are appropriate
- A check of the individual's employment history
- Verification of their medical fitness to carry out the duties of the role in accordance with relevant employment legislation

Where an enhanced DBS certificate has not been received before employment commences, an individual will only begin work where this is lawful, a separate children's barred list check has been completed (where applicable), and an appropriate written risk assessment has been undertaken.

We will not retain copies of DBS certificates for longer than six months. A record will be maintained of the date of the check, certificate number, recruitment decision and any risk assessment undertaken.

**Regulated activity**

Regulated activity is defined in legislation and includes work that involves teaching, training, instructing, caring for or supervising children on a regular basis, or providing personal care or healthcare to children.

Individuals who are engaged in regulated activity must have an enhanced DBS check with children's barred list information before undertaking that work.

**Existing staff**

The Trust expects all staff to maintain the highest standards of professional conduct.

Staff are required to inform the headteacher without delay if there is any change in their circumstances that may affect their suitability to work with children.

The school may undertake additional safeguarding checks where:

- concerns arise regarding an individual's suitability to work with children
- an individual moves into a role that constitutes regulated activity

- there has been a significant break in service
- The nature of the role changes significantly

- The Trust may require staff to complete periodic declarations confirming that there have been no changes to their suitability to work with children.

Where a member of staff has harmed, or poses a risk of harm to, a child or vulnerable adult, the school will fulfil its legal duty to make referrals to the Disclosure and Barring Service (DBS), the Teaching Regulation Agency (TRA), or any other relevant professional body where the referral criteria are met.

**Agency and third-party staff**

Before agency or third-party staff begin work, the school will obtain written confirmation that all required pre-employment checks have been completed.

The school will verify the individual's identity on arrival and ensure they receive an appropriate safeguarding induction, including:

- The identity of the Designated Safeguarding Lead (DSL)
- Child protection reporting procedures
- Staff Code of Conduct
- Any relevant local safeguarding arrangements

**Contractors**

The school will ensure that contractors working on site have undergone the appropriate level of safeguarding checks, taking account of the nature of their work and whether they will have opportunities for contact with children.

Where contractors are not appropriately checked, they will be supervised at all times whilst on the school site and will not undertake regulated activity.

The identity of contractors will be verified before they commence work.

**Initial teacher training students**

Where trainee teachers are employed directly by the school, all required safer recruitment checks will be completed.

Where trainee teachers are placed through an accredited training provider, the school will obtain written confirmation that the provider has completed the necessary pre-placement checks and has confirmed the trainee's suitability to work with children.

**Volunteers**

The school recognises the valuable contribution volunteers make.

The school will undertake recruitment and vetting checks on volunteers in accordance with KCSIE 2026 and DBS guidance.

Where a volunteer is carrying out regulated activity, the school will obtain an enhanced DBS check including a children's barred list check before the individual undertakes that role.

The school will undertake a written risk assessment and determine the level of supervision and checks required for all volunteers. Supervision arrangements will not be used as a substitute for the statutory safeguarding checks required for individuals undertaking regulated activity.

Volunteers who have not completed the appropriate safeguarding checks will not be permitted to undertake duties which constitute regulated activity.

**Governors, Trustees and Members**

- The Trust will ensure that Trustees, Local Governors and Members receive the safeguarding checks required by legislation and statutory guidance before appointment where applicable.

Appropriate identity, prohibition, Section 128, right to work and overseas checks will also be completed where required.

all governors and Trustees will receive safeguarding induction and regular safeguarding training to enable them to fulfil their statutory responsibilities.

**Alternative provision**

Where pupils attend alternative provision, the school remains responsible for ensuring that appropriate safeguarding arrangements are in place.

Before a placement begins, written confirmation will be obtained that appropriate safer recruitment checks have been completed on relevant staff.

The school will maintain regular oversight of the placement, including attendance, welfare, behaviour and educational progress.

**Work experience**

The school will ensure appropriate safeguarding arrangements are in place for all work experience placements.

Risk assessments will be undertaken where appropriate, and consideration will be given to whether DBS checks are required based on the nature of the placement, the age of the pupil, the level of supervision provided and whether the activity constitutes regulated activity.

**Host families**

Where the school arrange for pupils to stay with host families, appropriate safeguarding checks will be undertaken in accordance with statutory guidance.

Where overseas visits are organised, the school will work with partner organisations to obtain suitable safeguarding assurances and complete appropriate risk assessments before the visit takes place.

## Appendix 3: allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

This section applies where an allegation is made that may meet the harms threshold. Anyone who has a concern about the behaviour of a member of staff, supply staff, volunteer or contractor must report it immediately to the headteacher (or Principal). Allegations about the headteacher must be reported to the Chair of Governors/Trustees.

If it meets one of the four categories of harm (see below), then it must be reported to the LADO/DO, who will decide whether an internal or external investigation is required

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### Suspension of the accused until the case is resolved

Suspension is not an automatic response to an allegation. Advice will normally be sought from the LADO/DO before any decision is made. Suspension will only be considered where there is reason to believe a child or other children may be at risk of harm, or where the allegation is so serious that it may be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk and advice from the LADO/DO and the IFtL DSL, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not encounter the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the school trust

The case manager will seek advice from the LADO/DO, the Trust's HR adviser and, where appropriate, the police and children's social care before making decisions regarding suspension or alternative arrangements.

**Definitions for outcomes of allegation investigations**

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

**Procedure for dealing with allegations**

In the event of an allegation that meets the Harm criteria, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the Local Authority Designated Officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO/DO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO/DO, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's own family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO/DO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- **If it is decided that no further action is to be taken** regarding the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO/DO what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO/DO to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Advice is accessible through the 24/7 helpline.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

The LADO/DO will act as a source of advice and guidance all through the process. Where required, the school will notify Ofsted of any significant events in line with the Early Years Foundation Stage statutory framework.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Consideration will be given and a decision made about whether a report needs to go to DBS, the LADO/DO will advise on this.

**Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO/DO to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

**Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- Cases involving criminal investigations, are more complicated and reliant on decisions being made by the Crown Prosecution Service

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

**Specific actions**

**Action following a criminal investigation or prosecution**

The case manager will discuss with the Local Authority's Designated Officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

**Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will also refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Allegations that are substantiated will be retained on the personnel file until the person reaches normal pension age or for 10 years from the date of the allegation, whichever is longer.

**Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

**Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it
- Unfounded, false or malicious allegations will be removed from their personnel file at the conclusion of the investigation.

**Confidentiality and information sharing**

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

The case manager will take advice from the LADO/DO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

**Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case as appropriate.

The records of any allegation that, following an investigation, is found to be unfounded, malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations, they will be kept on the personnel file.

The following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

**References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include any substantiated allegations, provided that the information is factual and does not include opinions

**Learning lessons**

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

**Historic allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO/DO in line with our local authority's procedures for dealing with historic allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

**Section 2: concerns that do not meet the harm threshold (known as low level concerns)**

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

The Trust is committed to creating a culture of openness, transparency and accountability, where staff feel confident to raise concerns about their own behaviour or that of others without fear of reprisal. Early identification and management of low-level concerns helps to protect children and maintain professional standards.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

**Definition of low-level concerns**

The term 'low-level' concern is any concern refers to actions where there is does not mee the harms threshold to a child, but they have behaved in a way that is considered inappropriate– no matter how small. 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**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly 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
- Attending work impaired through alcohol or dugs
- Using inappropriate sexualised, intimidating or offensive language

Concerns may arise from behaviour in school, outside of school or online where that behaviour may indicate that an individual is unsuitable to work with children.

**Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer. Staff are encouraged to self-report where they believe their own behaviour may have fallen below the expected standards. Failure to report concerns may be managed through the Trust's disciplinary procedures where appropriate.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system
- All staff agree to being open and honest and not bringing the school into disrepute.

**Responding to low-level concerns**

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct.

Keeping Children Safe in Education also links to this report for more information Developing and implementing a low-level concerns policy: A guide for organisations which work with children]

All low-level concerns are taken seriously and followed up on, as this may be an early sign of behaviour that could be harmful to children or the reputation of the school and the Trust.

The IFtL Low level concern policy should be adhered to at all times.

**Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained in accordance with the Trust's records retention schedule and data protection requirements.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

**References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the LADO/DO at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance
- Substantiated

## Appendix 4: specific safeguarding issues

### Children who are absent from education

A child going absent from education, particularly repeatedly, or for prolonged periods, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become absent from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Are at risk of child criminal exploitation or child sexual exploitation
- At risk of gang activity or county lines
- Come from new migrant families

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

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage. Where pupils are absent from school for prolonged periods, we will follow our attendance policy to ensure that pupils are seen regularly by a member of the school staff and that pupil is supported to return to school as soon as they are able to.

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

Referrals relating to children absent from education will be made in accordance with local authority procedures.

### Children in Alternative Provision

The school retains responsibility for safeguarding children placed in alternative provision and will maintain regular oversight of attendance, engagement, welfare, progress and safeguarding arrangements throughout the placement.

The DSL alongside the SENco and headteacher should ensure that the appropriate due diligence has been completed prior to the child starting at the Alternative provision. This must include obtaining the appropriate Safer recruitment checks, letter of assurance inclusive of staff DBS information and the setting's safeguarding policy. The school should also ensure they receive regular attendance, engagement and attainment information from the Alternative provision.

The cohort of pupils in Alternative Provision often have complex needs, it is important that the setting is made aware of any risk assessments, safety plans, or external services that are supporting the pupil/ family.

**Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly being absent from school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

The DSL will complete any local risk assessment or exploitation screening tool required by the safeguarding partnership.

**Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

**The DSL will complete any local risk assessment or exploitation screening tool required by the safeguarding partnership. Domestic abuse**

Domestic Abuse Act 2021 states that children can be direct victims of domestic abuse as well as witnessing and being adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances. Where sage and appropriate, the school may signpost the non-abusive parent or carer to specialist domestic abuse support.

**Homelessness**

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

The DSL and deputy will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

The lack of a stable home is always a child protection issue.

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

**Honour or faith-based abuse (including FGM and forced marriage)**

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

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

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

Staff must never discuss HBA directly with family if they believe it puts the child at increased risk or may create a flight risk.

**FGM**

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

A girl:

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

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

**Forced marriage**

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. From 2022, the legal minimum age for marriage has increased to 18 years. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form or coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

**Preventing radicalisation**

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that's aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results in (1) or (2).
- **Terrorism** is an action that:
- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate, Act early and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views

- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online,
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation often do not fit in and may be searching for a sense of identity or belonging, they may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

**Artificial Intelligence (AI)**

Staff should be aware that AI may be used to facilitate safeguarding risks, including bullying, harassment, exploitation, the creation of indecent or sexualised images, impersonation, misinformation and fraud. The Trust recognises both the educational benefits and safeguarding risks associated with AI and will ensure pupils are educated in its safe and responsible use through the curriculum. Concerns relating to the misuse of AI should be managed in line with this policy, the online safety policy and the school's behaviour policy.

**Child-on-Child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including online-bullying, prejudice-based and discriminatory bullying)
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents.
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- 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, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nudes' images and/or videos (also known as sexting or youth produced sexual imagery)
- 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
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. Section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

**Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk. Schools should create a safe place for children to report concerns and encourage trusted adults to support children who are also mindful of the need to work within professional boundaries.

Children who have been sexually harmed may need additional support through other agencies such as contraceptive advice, STI testing, counselling, guidance on healthy relationships and consent.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

We are aware and must be particularly vigilant for signs of sexual violence and harassment as we know that it is highly prevalent, and children often do not talk out about this and even accept it as the 'norm'. We must ensure this is not the case in any of our schools.

**Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

Risk factors which increase the likelihood of involvement in serious violence include:

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

**Children who are LGBTQ+**

Children who are lesbian, gay, bisexual or who are questioning their gender may be particularly vulnerable to bullying, prejudice-based abuse and discrimination. Staff should be alert to these risks and ensure children have access to trusted adults and appropriate support. Being LGBTQ+ or questioning gender is not, in itself, a safeguarding concern, however these children may experience additional vulnerabilities which require safeguarding consideration. LGBTQ+ inclusion is embedded within PSHE and Relationship and Sex Education.

**Children questioning their gender**

Children questioning their gender may experience a range of social, emotional or mental health needs. While questioning gender is not, in itself, a safeguarding concern, some children may be vulnerable to abuse, bullying, coercion, exploitation, self-harm, online influence or family conflict. Schools should consider whether any safeguarding concerns are present and respond in line with KCSIE (2026).

Where a child is questioning their gender, staff should:

- Listen respectfully to the child and avoid making assumptions
- Record any concerns in line with school safeguarding procedures
- Share concerns with the DSL where there are safeguarding, welfare or wellbeing concerns
- Consider the child's age, understanding and individual circumstances
- Consider whether the child may be experiencing bullying, abuse, coercion, online harms or mental health difficulties
- Work with parents and carers wherever appropriate, unless doing so would place the child at risk of significant harm
- Seek advice from relevant professionals where appropriate.

The welfare of the child will always be the school's paramount consideration. Decisions will be made on an individual basis, taking account of safeguarding, wellbeing, statutory guidance and any relevant risk assessments.

Where requests are made relating to names, pronouns, participation in activities, access to facilities or other aspects of school life, these will be considered individually by the school, with safeguarding and the best interests of the child at the centre of decision-making.

**Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge at all times.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff, at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Staff have been taught to challenge anyone not wearing a lanyard or wearing one that indicates they should be accompanied at all times.

**Non-collection of children**

If a child is not collected at the end of the session/day, we will:

- Wait with the pupil in a safe space, younger children will be with a familiar adult
- Two people must remain with the child

- Attempt to make contact with each emergency contact
- Send a text message to the priority contacts
- Escalate to MK MASH should school be unable to make contact with someone on the priority list
- The incident will then be recorded on the electronic system for safeguarding

**Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact the parent(s) by telephone
- If school is unable to make contact, then a text message and/or email will be sent to the parents/carers asking for them to make contact within an hour timeframe
- If no contact is made, then a home welfare check will be scheduled to take place. DSLs will make a decision depending on previous levels of need and decide whether immediate escalation to MASH is necessary.
- A home welfare check may be carried out and details of this will be logged on the school's electronic safeguarding system. Two members of staff will attend.
- If there is no answer at the property, then a note will be posted through the door asking for contact to be made immediately with school. A call to MK MASH will be made to explain the concerns.
- If no contact is made with school within 2 hours, then MK MASH will be contacted to further escalate the issue. A welfare check may be requested from Thames Valley Police.
- All information will be logged on the electronic system.

**Home Visits**

Any home visits must be undertaken with a very clear purpose for the visit. Staff must be aware of the value of a home visit but also the limitations.

Objectives must be set beforehand and reviewed on return.

Staff should not enter a home without parents' permission or without parents being present unless in the event of an emergency. In the event of an emergency, they must consider involving police to protect themselves and the child.

Home visits should only be undertaken in a place which is open and visible. They should not see children in bedrooms, but in living room, kitchen or in the garden, in sight of parents.

Children should be given the opportunity to raise concerns without the presence of their parent; staff must consider how this can be managed safely.

On return to school, a full report should be completed detailing what they have seen, how the child has reacted, and the responses given.

## Appendix 5: Children Questioning their Gender – Supporting Guidance

**Supporting children who are questioning their gender**

IFtL recognises that some children may question the way the feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

Schools should respond to children who are questioning their gender with care, sensitivity and professional curiosity, seeking to understand the individual circumstances and experiences of the child. Schools should remain aware of potential vulnerabilities, including mental health and wellbeing concerns, relationships with family or peers, and experiences of discrimination or bullying.

Schools will not initiate action regarding social transition. Where a child or parent/career requests support relating to social transition, the school will carefully consider the request in line with safeguarding duties, equality and human rights obligations, and the welfare and best interests of the child and other children.

The DSL must be involved in considerations relating to requests for support with social transition. Decisions must be appropriately recorded, including the rationale for decisions made, and reviewed where circumstances change.

**Working with parents and carers**

Parents and carers have an important role in the lives of their children. Where a child requests support relating to social transition, schools will seek to work with parents/carers as a matter of priority.

In the rare circumstances where involving parents/carers may present a greater safeguarding risk to the child, the DSL will consider what action is required to safeguard the child before parents/carers are contacted or decisions are made.

**Toilets, changing facilities and sport**

Schools have a duty to safeguard and promote the welfare of all children and must ensure that facilities are appropriate, safe and protect the privacy, dignity and wellbeing of all pupils.

In accordance with KCSIE, schools must not allow children to use toilets designated for the opposite biological sex. Where a child who is questioning their gender does not wish to use the toilet designated for their biological sex, schools should consider whether alternative facilities, such as a single-user toilet, can be provided without compromising the safety, comfort, privacy or dignity of that child or other pupils.

Schools must not allow children aged 11 or over at the start of the school year to undress in front of children of the opposite biological sex. Where a child does not wish to use changing facilities designated for their biological sex, schools should consider whether alternative arrangements can

be made, such as access to an individual changing facility or access at an alternative time, while ensuring that the safety, privacy, comfort and dignity of all pupils are maintained.

Schools should keep clear records of any arrangements agreed, ensure relevant staff understand any agreed arrangements, and review arrangements regularly.

Where schools provide single-sex sport for safety reasons, children must not participate in sport designated for the opposite biological sex. Decisions regarding participation should take account of safeguarding, safety, fairness and the wellbeing of all children.

**Bullying and discrimination**

All children have the right to feel safe, valued and respected. Bullying, harassment and discrimination are not tolerated. Any concerns relating to a child who is questioning their gender, including concerns about bullying or discriminatory behaviour, will be addressed in line with the Trust's behaviour and anti-bullying procedures.