The 3-18 Education Trust

Safeguarding and Child Protection Policy

'Every individual is in a great school.'

Approved: **Pending**
Review: **Autumn Term 2027**

www.3-18education.co.uk

Our Mission

To celebrate the diverse nature, culture and identity of our individual schools, whilst collaborating and enjoying the benefit of the team.

Our Values

Compassionate
To show care and understanding towards others.

Accomplished
To provide high quality education and training for all.

Resilient
To be solution focused and able to intelligently manage challenges.

The 3-18 Education Trust
101 Longden Road
Shrewsbury
SY3 9PS

Company Number: 08064698

Policy Monitoring and Review

Monitoring

The Chief Executive Officer will monitor the outcomes and impact of this policy on an annual basis.

Review

Member of Staff Responsible	Chief Executive Officer
Relevant Guidance/Advice/Legal Reference	Legislation: Education Act 2002 Section 157 (Independent schools incl Academies and CTC's) The Education (Independent School Standards) Regulations 2014 Children Act 2004 Children's Wellbeing and Schools Act 2026 Crime and Policing Act 2026 Data (Use and Access) Act 2025 Statutory National Guidance/Standards: Keeping Children Safe in Education and any legislation or guidance (statutory/non-statutory) outlined or referenced within it. Early years foundation stage (EYFS) statutory framework Working Together to Safeguard Children and any legislation or guidance (statutory or non-statutory) outlined or referenced within it. Local Procedures: West Midlands Safeguarding Children Procedures Shropshire Safeguarding Community Partnership (SSCP) Children's Threshold Document Shropshire Safeguarding Community Partnership Allegations about staff/volunteers protocol
Policy Adopted By	Board of Directors
Consultation	Local Committees
Date of Policy	Autumn Term 2026
Review Period	Annually
Date of Next Review	Autumn Term 2027

Contents

1. Introduction 7
2. The Trust's Safeguarding Statement 7
3. Key Terms 8
4. Roles and Responsibilities 9
   - Trust Board 9
   - The Chief Executive Officer (CEO) 9
   - The Safeguarding Link Director 10
   - Local Committees (LC) 10
   - Headteachers 10
   - The Designated Safeguarding Leads (DSL) 11
   - All Staff (including students on placement and volunteers): 12
5. Professional Development and Support 12
6. Ensuring Safeguarding Practice Across the Trust 13
   - Safer Recruitment 13
   - Contractors 14
   - Visitors 14
   - Work experience (*Secondary Schools/Colleges only*) 15
   - Use of School Premises for Non-School Activities. 15
7. Ensuring Safe Staff 16
   - Managing allegations (including low level concerns) 16
   - 1. Allegations that may meet the harm threshold. 17
   - 2. Allegations / concerns that do not meet the harms threshold (low-level concerns). 17
   - Whistle Blowing 18
8. Record Keeping and Information Security 18
   - Storage and Management of Safeguarding Information (Child Protection files) 19
   - Sharing Safeguarding Information 20
   - Sharing Information with Other Organisations 20
   - Transfer of Child Protection Files and Other Safeguarding Information 21
9. Working in Partnership 22
   - Children 22
   - Parents 23
   - Other Agencies/Partnerships 23
10. Teaching Children How to Keep Safe 24

11. Online Safety....25
12. Preventing Radicalisation....26
13. Children Potentially at Greater Risk of Harm....27
Children Who Need Local Authority Social Care (Child in Need and Child Protection Plans)....28
Looked After Children and Previously Looked After Children....28
Children who attend Alternative provision....28
Children who are absent from or are not in receipt of full-time education....29
Children Who are Electively Home Educated....30
14. Children whose behaviour causes concern....30
Safeguarding Children with medical conditions....32
Children Requiring Mental Health Support....32
Children with Special Education Needs and/or Disabilities....33
Children who are lesbian, gay, or bisexual....34
Children who are questioning their gender....34
Young Carers....35
Children under 5, particularly babies and those not yet born....36
Children who are Black, Asian, Mixed Heritage or from other minoritised ethnic communities...36
15. Child-on-Child Abuse (including harassment and violence)....36
16. Staff Safeguarding Concerns: Recognise, Respond, Report....38
17. Respond....39
Immediate safety....39
Other relevant policies/processes....39
Injuries....39
Seek views and gather information from the CYP and others....40
When Concerns are Directly Shared by a CYP....40
....41
18. Report....41
Report to Designated Safeguarding Lead....41
Record concerns....42
19. Designated Safeguarding Lead Response....42
Consider and Assess the Concern....42
Decide on What Action to Take....42
Record Actions, Decisions, and Outcomes....44
Manage and Oversee any Ongoing Response....44
20. Linked Policies and Procedures....44
Appendix A Professional Development and Support Minimum Training Requirements....46

Appendix B: File Transfer Documentation 49
Appendix C: CYP-on-CYP Abuse (including harassment and violence) Procedures.....50
Appendix D: School Specific Safeguarding Procedures SCHOOLSTO PERSONALISE...57
Appendix E: The Belonging Framework.....60

1. Introduction

1.1. This policy applies to anyone working for, on behalf of, or representing The 3-18 Education Trust (Trust) including members, directors, local committee members, senior managers, staff, volunteers, contractors, agency staff and students on placement. This policy has been agreed by the Board of Directors following guidance issued by Shropshire Council.

1.2. The policy is publicly available on each of the Trust school websites (and on request from the school) so that it can be accessible for children, their families and anyone visiting and /or working with the Trust.

1.3. The policy aims to meet the requirements as outlined in Part 2 Keeping children safe in education and Section 3 EYFS statutory framework for group and school-based providers .

2. The Trust's Safeguarding Statement

2.1. The Trust believes that:

- All children and young people (CYP) have the right to protection from all types of abuse, neglect, exploitation and/or harm.
- Everyone has a responsibility to promote the welfare of all CYP, to keep them safe and to practice in a way that protects them.

2.2. This means that the Trust will:

- Not tolerate the abuse, neglect or exploitation of children and young people (CYP). This includes never accepting, dismissing or tolerating and always challenging or raising concerns about words or actions which downplay, justify, or promote discrimination, abuse, neglect, exploitation and/or harm; including child-on-child abuse (including harassment and violence). This applies to anyone who is part of, comes into, or works in any of the schools or settings.
- Be child centred [1]and ensure that we consider the best interests of CYP in everything that we do. This includes ensuring that we enable CYP's voices and experiences to be heard (using communication tools and advocacy if necessary); and that CYP are involved in and informed about the decisions being made about them.
- Ensure a safe environment for CYP to learn, grow and develop is provided and CYP feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse, neglect, exploitation and/or harm of a CYP.
- Ensure no CYP or group of CYP are treated less favourably by schools than others. This means being inclusive, anti-discriminatory and responsive to the needs and experiences of CYP and families, particularly those who are in group or communities who are more likely to experience discrimination.
- Recognise that bias can be a barrier to safeguarding practice including professional curiosity; which can adversely impact CYP in some groups or communities.

[1] See Working Together to Safeguard Children: Chapter 1: A Child centred approach

- Be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of a CYP who the schools know are more vulnerable to experiencing abuse, neglect, exploitation, harm or discrimination.
- Work in partnership with the school's CYP, their parents, carers, and other agencies.

3. Key Terms

3.1. **Safeguarding** and promoting the welfare of children is defined in Working Together to Safeguard Children as:

- providing help and support to meet the needs of CYP as soon as problems emerge,
- protecting CYP from maltreatment, whether this is within or outside of the home, including online,
- preventing impairment of CYP's mental and physical health or development,
- ensuring that CYP grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of CYP 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 CYP; and
- taking action to enable all CYP to have the best outcomes[2]:

3.2. **Child Protection** is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific CYP who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

3.3. **Abuse** is a form of maltreatment of a CYP. Somebody may abuse or neglect a CYP by inflicting harm, or by failing to act to prevent harm.

3.4. 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 CYP 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.

3.5. CYP may be abused or harmed in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others.

3.6. Abuse or harm can take place wholly online, or technology may be used to facilitate offline abuse. CYP may be abused or harmed by an adult or adults, or another CYP or CYP(plural). This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

3.7. There are a number of types of abuse and safeguarding issues that could increase the risk that a CYP could be abused. These are further defined and explained in Part 1, Part 5 and Annex A of Keeping children safe in education .

[2] Children's social care: national framework - GOV.UK (www.gov.uk)

3.8. **Staff** refers to all those working for or on behalf of the Trust, full or part time, temporary or permanent in either a paid or voluntary capacity. The exceptions to this term are directors and local committee members.

3.9. **Directors** refers to those who are part of the Trust Board.

3.10. **Local committee members** refers to those who are part of the individual school's Local Committee.

3.11. **Child/Children and Young Person/People (CYP)** includes everyone of the age 18 and under.

3.12. A **Parent** refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child.[3]

3.13. Data protection laws refer collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

4. Roles and Responsibilities

4.1. The Trust follows the statutory guidance as set out in the latest Keeping children safe in education (and associated documents and guidance); adhering to the roles and responsibilities and expectations identified for:

Trust Board

4.2. The Trust Board has a strategic leadership responsibility for ensuring the Trust takes a whole Trust approach to safeguarding arrangements as outlined in this policy and that we comply with duties under the related legislation and guidance listed later in this policy. Keeping Children Safe in Education Part 2 outlines the key responsibilities. The Trust Board has delegated some responsibilities, although retains accountability, as follows.

The Chief Executive Officer (CEO)

4.3. The CEO ensures:

- Each Trust school has a Designated Safeguarding Lead (DSL) who has the appropriate status, authority, skills and experience to carry out the duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- Continuity of safeguarding responsibilities if the Designated Safeguarding Lead is unavailable due to illness, leave, or other circumstances.
- Each Trust school adheres to this policy and has procedures in place (as outlined in Part 2 Keeping Children Safe in Education and The Early years foundation stage (EYFS) statutory framework) that are implemented effectively and comply with the Trust's duties under the related legislation and guidance listed later in this policy.
- The Trust has adequate executive leadership by appointing:
    - Trust Safeguarding Lead (TSL): Claire Jones
    - Director of Inclusion (DoI): Sadie Howson

[3] S576 Education Act 1996

- All staff are knowledgeable and confident in carrying out their safeguarding duties in line with training and the related legislation and guidance listed later in this policy.

The Safeguarding Link Director

4.4. The Trust Board has appointed a Safeguarding Link Director who is responsible for meeting with the Trust Safeguarding Lead each term and reporting back to the Trust Board normally by a written report.

4.5. Safeguarding Link Director: Ann O'Brien

Local Committees (LC)

4.6. Under the Scheme of Delegation, the Trust Board has delegated monitoring of the effectiveness and implementation of safeguarding arrangements at school level to LCs. Each individual LC will appoint a Safeguarding Link Committee Member. Each Safeguarding Link Committee Member is responsible for leading on the governance oversight of safeguarding arrangements. They meet with the DSL on a termly basis and report back to the LC normally by a written report after conducting site reviews and discussions around contextual themes with the safeguarding team within the school.

4.7. The Safeguarding Link Local committee members for the Trust's schools are as follows:

- Bowbrook Primary School: Phil Wilson
- Bridgnorth Endowed: David Beech
- Clive Primary School:
- Coleham Primary: Harry Taylor
- Hodnet Primary School: Jenny Rogers
- John Wilkinson Primary School:
- Lakelands Academy
- Much Wenlock Primary School:
- Prees Primary School:
- St Martins School: Franki Quatrell
- The Priory School: David Williamson
- Thomas Adams School: Matthew Barratt
- Whixall Primary School:
- William Brookes School: TBC

4.8. The Chair of the LC will liaise with the CEO in the event of an allegation of abuse made against the Headteacher as outlined in the Ensuring Safe Staff section of this policy.

Headteachers

4.9. Headteachers are responsible (with the lead support of the DSL for each school) for ensuring safeguarding arrangements are implemented effectively in their school. Responsibilities include:

- Having the overarching responsibility of ensuring the effectiveness of the school's safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the LC (with the support of the DSL) on the effectiveness of school safeguarding arrangements.

- Supporting and promoting a whole school safeguarding culture and ethos as outlined in the Safeguarding Statement. This includes ensuring that the Senior Leadership Team (SLT) work effectively together and with the DSL, to ensure a whole school approach to safeguarding.
- Taking the lead role in ensuring the school implements safe practice including ensuring staff are knowledgeable and confident in their safeguarding practice and that practice is in line with national and local requirements. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liaising with the Local Authority Designated Officer (LADO) with the support of the DSL or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the DSL and any deputy(ies) to carry out their roles effectively. This means ensuring that they have the appropriate status, authority, skills and experience to carry out duties of the post and are given sufficient time, training, support, resources. They should also ensure continuity of safeguarding responsibilities if the Designated Safeguarding Lead is unavailable due to illness, leave, or other circumstances.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.
- Ensuring that school policies relating to site safety and health and safety guidance and relevant legislation are in place, implemented and followed by all staff.
- Ensuring they notify Ofsted of any changes as outlined in Early Years Foundation Stage Statutory Framework
- Ensuring that school policies and procedures relating to site safety and health and safety guidance and relevant legislation are in place which are referenced in Keeping Children Safe in Education and the Early Years Foundation Stage Statutory Framework and local arrangements are, implemented and followed by all staff.

The Designated Safeguarding Leads (DSL)

4.10. The DSL for each school takes the lead responsibility for safeguarding and Child protection in their school. Annex B Keeping children safe in education outlines their key responsibilities. Deputy Designated Safeguarding Lead(s) (DDSL) support the DSL in the discharge of their responsibilities. Responsibilities include:

- Ensuring that the school has a Safeguarding and Child Protection Policy in place as required by Keeping children safe in education, and Early years foundation stage (EYFS) statutory framework , that is implemented and followed by all staff.
- Being available to deal with safeguarding and Child protection during school hours. Each DSL will put in place cover arrangements for outside the school's day and term times where necessary. Details can be obtained by contacting the DSL.
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and to their school.
- Supporting the Headteacher to implement safe practice in their school.
- Managing safeguarding referrals to the relevant Local Authority; Police and any other statutory authorities or multi-agency risk management arrangements (see DSL Response).

- Working closely with the Trust, Headteacher and relevant SLT members to ensure a whole school safeguarding culture and ethos as outlined in the Trust's Safeguarding Statement and the implementation of effective safeguarding arrangements.
- Acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership, Telford and Wrekin Safeguarding Partnership and other Safeguarding Partnerships depending on the CYP's home local authority, as outlined in Working in Partnership section of this policy.
- Ensuring CYP and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to as outlined in Working in Partnership section of this policy.
- Acting as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and child protection in their school.
- Ensuring the effective management and oversight of safeguarding information as outlined in the Record Keeping and Information Security section of this policy.
- Maintaining records for staff and volunteers training.

Non-Designated Safeguarding Lead Senior Leaders:

Are responsible for supporting the Headteacher and Designated Safeguarding Lead for ensuring and delivering safeguarding arrangements effectively in school. This includes**:**

- Working closely with the Trust, Headteacher, Designated Safeguarding Lead and each other to ensure a whole school safeguarding culture and ethos as outlined in the Safeguarding Statement and the implementation of effective safeguarding arrangements, as outlined in this policy.
- Ensuring that that they work effectively with the Headteacher and Designated Safeguarding Lead to ensure that (where it is part of their lead role) policies and procedures relating to CYP potentially at greater risk of harm, or Ensuring Safe Practice are implemented and followed by all staff.

All Staff (including students on placement and volunteers):

4.11. All Staff are expected to work in line with the Trust's Safeguarding Statement and adhere to the policies, processes and systems of the Trust and each school that support safeguarding. This specifically includes:

- Accessing and maintaining professional development and support to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, respond and report staff Safeguarding concerns.
- Engaging in safe practice. This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of CYP as outlined in Ensuring Safe Staff section of the is policy.
- Teaching CYP how to keep safe.

5. Professional Development and Support

5.1. Within the Trust, to ensure all staff are knowledgeable and confident in keeping CYP safe in the schools, staff will complete the professional development activities as outlined below:

- Read information on school safeguarding arrangements and procedures as outlined in Keeping children safe in education upon induction or when arrangements/procedures are updated.
- Read the relevant parts in Keeping children safe in education (KCSiE)
- Complete annual safeguarding training and either accompanying quiz or LA provided quiz for assessment.
- Complete Safeguarding Awareness Training in line with local processes
- Engage with National and local Child Protection updates
- FGM training
- Prevent awareness training
- Cyber Security training
- Online Safety training

5.2. This is the minimum requirement for Trust staff and schools will assess and monitor individual staff's training needs. Schools will maintain professional development records to monitor completion but will also be expected to revisit and check application of training to ensure safeguarding becomes at the heart of each school's culture.

5.3. The DSL and DDSL(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. The DSL and DDSLs receive regular support and supervision from within the school and from external providers when needed including from the Trust's Educational Psychologist who is trained in clinical supervision.

5.4. The minimum training requirements for staff, volunteers, DLSs, DDSLs, directors and local committee members and frequency are outlined in Appendix A

6. Ensuring Safeguarding Practice Across the Trust

Safer Recruitment

6.1. The Trust adopts robust recruitment procedures that deter and prevent people who are unsuitable to work with CYP from applying for or securing employment or volunteering opportunities in any of the Trust's settings. All staff involved in recruitment complete additional safer recruitment training as outlined in the Professional Development and Support section of this policy. Recruitment procedures are outlined in the Trust's Safer Recruitment Policy and are in alignment with Keeping children safe in education: Part 3 and EYFS Part 3.

6.2. As part of the Trust's recruitment and selection processes; we ensure that the commitment to safeguarding and promoting the welfare of CYP is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with CYP being deterred and identified at the earliest point. This policy is included in the application information for candidates. The Trust also ensures that all applicants complete a robust application form. Suitable references are sought, and online social media checks are carried out prior to interview; as well as ensuring that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

6.3. In accordance with Keeping Children Safe in Education 2026: Part 3; the Trust maintains a record of information received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students on placement), directors, local committee members, contractors, and visitors who attend the Trust in a professional capacity. The Trust complete the checks on staff, volunteers, directors, and local committee members who are recruited by the Trust. For those who are recruited by others; the Trust ensures receipt of written confirmation that the relevant checks have been completed and their identification checked before they are allowed to work unsupervised or engage in regulated activity with CYP.

6.4. Where all the necessary information has not been obtained or there are gaps in the information, the Trust has robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability does not work unsupervised or engage in regulated activity with CYP. We do not allow individuals to begin working or volunteering (including acting as a Local Committee Member/Director) for us until we have received and reviewed their enhanced criminal records check and barred list check or without a full risk assessment around supervision in exceptional circumstances. The Trust reserve the right to refuse access to any Trust site for any person who the Trust is not assured is safe to work or engage in regulated activity with CYP.

Commented [SH1]: Laura, can I double check our stance hasn't changed here - that we do allow risk assessments in exceptional circumstances?

6.5. On appointment, staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of the Trust's settings as outlined in the Staff Code of Conduct (which is available on request).

6.6. If any safeguarding concerns of allegations arise relating to a member of staff, director, local committee member or other person working on the Trust's school premises, staff are expected to act in line with the sections Ensuring Safe Staff and Staff Safeguarding Concerns: Recognise, Respond, Report within this policy.

Contractors

6.7. The Trust has several contracts with external providers (including Alternative Providers) to work in or with schools including with CYP. Each school writes to these contractors on an annual basis seeking written confirmation that all the necessary safeguarding checks have been carried out on all contractors coming into school. This information is then logged on each school's Single Central Record of which the Trust has oversight of centrally for an additional layer of security. A robust process is in place in each school when contractors arrive on site to ensure that the necessary checks have taken place before they are allowed entry into school.

Visitors

6.8. The Trust has a range of visitors to offices and schools, including professional visitors, family members or others attending school events. All visitors to offices and schools are expected to act in accordance with the safeguarding statement. Schools have clear procedures for recording the details and confirming the identity of visitors, including prospective candidates for employment and volunteering through the use of a visitors log which is linked to the school's Single Central Record. We ensure that schools have control

over who comes into the schools' premises so that no unauthorised person has unsupervised access to CYP.

6.9. Schools check the identification of visitors where needed and make sure that professional visitors who attend schools have had the appropriate DBS check depending on the activity they are there to carry out, or that the visitor's employers have sent the appropriate confirmation around relevant checks needed. Schools do not ask to see DBS certificates where confirmation has been secured in advance.

6.10. When external speakers or visitors attend schools' premises (whether for school or non-school activities); schools conduct due diligence checks to ensure that their views and delivery of material continues to ensure school is a safe place. This continues to ensure the Trust are teaching CYP how to keep safe; as well as promoting fundamental British Values and community cohesion (please also see Preventing Radicalisation).

Work experience (*Secondary Schools/Colleges only*)

6.11. The schools have processes in place to ensure that individuals or companies who provide work experience placements for CYP have appropriate safeguarding policies and procedures in place. They ensure that any adults who are supervising CYP on work experience have the appropriate checks carried out as required by Keeping children safe in education: Part 3: Adults who supervise children on work experience".

6.12. If a CYP's work experience placement is in a "specified place" where regulated activity is carried out (such as an education or childcare setting); schools will work with the provider to ensure that the appropriate checks and/or risk assessments are carried out.

6.13. Schools will manage work experience placements through a digital platform called Unifrog so that schools and parents have visibility of the checks completed as well as behaviour expectations and who to raise concerns to.

Use of School Premises for Non-School Activities.

6.14. When extra-curricular activities out of school hours are arranged in any Trust schools, which are directly supervised/managed by school staff, this Safeguarding and Child Protection Policy is to be followed and any concerns should be managed in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

6.15. The Trust will follow the Ensuring Safe Staff procedures as outlined below if it becomes aware of any allegations relating to an organisation or individual using school premises.

6.16. Where schools have sessions or activities which are provided by another person or organisation that is using any school site and not during school time or under direct supervision, each school will seek assurances that the person or organisation has the required Child safeguarding arrangements in place as an individual/organisation as outlined in Keeping children safe during community activities and Visitors. This is regardless of whether CYP who are on roll at a Trust school access the activity or not.

6.17. The requirements for safeguarding arrangements will be set out within any transfer of control agreement, (i.e. lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

7. Ensuring Safe Staff

7.1. Staff are expected to act in line with this section when any safeguarding concerns or allegations arise for the following:

- Employed staff
- Supply Staff
- Trainee teachers
- Volunteers
- Local committee members/Directors
- Contractors
- Professional Visitors
- Organisations or Individuals using school premises for non-school activities

As further outlined in Roles and Responsibilities the Headteacher with the oversight of the Local Committee are responsible for ensuring the safety of the staff and volunteers working for, at or on behalf of Trust schools; irrespective of whether they are employed by the Trust or another employment agency or business/charity.

In some circumstances the Trust will have to consider an allegation against an individual not directly employed by the Trust; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business/charity. Where this applies, the Trust shares safeguarding responsibilities with the employment agency or business charity.

Supply teachers, trainee teachers and all contracted staff

The Trust have safeguarding responsibilities when it comes to supply teachers, trainee teachers and all contracted staff and will follow Keeping children safe in education Part 4: supply teachers, trainee teacher and all contracted staff.

Professional Visitors and Organisations or Individuals using school premises for non-school activities

When allegations that meet the harm threshold against individuals are made against professional visitors or Organisations or Individuals using school premises for non-school activities ; the Trust will contact the Manager of individual concerned and contact the Local Authority Designated Officer (and if necessary the Police) in accordance with Shropshire Safeguarding Community Partnership Managing Allegations Procedures.

When any allegations or concerns that do not meet the harm threshold (for example where an individual has not acted in according with expected standards for Visitors or agreement of Use of school premises for non-school activities); the Trust will report concerns to the Line Manager for the Professional Visitor or the Manager of the Organisation using the premises.

Outcomes arising from concerns raised may impact on decisions to allow professional visitors back on the school site or termination of agreements with agreement of Use of school premises for non-school activities

Managing allegations (including low level concerns)

7.2. In all Trust settings, an open and transparent culture is promoted in which all concerns about the behaviour or conduct of any adults working in, at or on behalf of the Trust are dealt with appropriately.

7.3. There are two levels of allegations/concerns:

1. Allegations that may meet the harm threshold.

7.4. Circumstances where someone working within or for the Trust has or may have:

- behaved in a way that has harmed a CYP, or may have harmed a CYP and/or
- possibly committed a criminal offence against or related to a CYP; or
- behaved towards a CYP in a way that indicates that they would pose a risk of harm to CYP; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with CYP. This includes any behaviour that may have occurred outside of a Trust setting that could pose a transferable risk.

7.5. Allegations that someone that working in, at or on behalf the Trust has met the harm threshold should be immediately referred to the school's Headteacher or Trust Safeguarding leads in person. Staff may be required to provide a written statement at the request of the Headteacher.

7.6. If the allegation relates to the Headteacher; this should be immediately reported to the CEO verbally.

7.7. If there is any conflict of interest or immediate risk of harm to a CYP or; then the person with the concern must ensure immediate safety and contact the Local Authority Designated Officer (LADO) in accordance with Shropshire Safeguarding Community Partnership Managing Allegations Procedures.

7.8. In most cases; the Headteacher (or the TSL) will lead on managing allegations; with the support of the Trust's HR and the DSL. They will ensure that Part 4 Keeping children safe in education and Shropshire Safeguarding Community Partnership Managing Allegations Procedures. are applied. Any allegations that meet the above criteria will be referred to the LADO within 1 working day and the Trust will follow their advice and guidance.

7.9. Where schools have nurseries, they will notify OFSTED as soon as reasonably practical and within 14 days of the allegation first being made, informing them of action taken by completing the online form. This will be done for any allegations of harm or abuse by anyone working or looking after CYP at the premises and will be completed irrespective of whether the allegations of harm or abuse are alleged to have been committed on the premises or elsewhere, for example, on a visit.

7.10. It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fair and consistent way, to effectively safeguard all those involved.

7.11. The Trust also has a duty of care towards staff, and will provide a named contact for the staff member.

7.12. If necessary, the Trust will adhere to the legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Keeping children safe in education if the criteria for such reporting is met.

2. Allegations / concerns that do not meet the harms threshold (low-level concerns).

7.13. The term low-level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with the Trust's Code of Conduct for Staff, including inappropriate conduct outside of work. The Code of Conduct outlines examples of what could be considered a low-level concern.
- Does not meet the harm threshold at point 1 above.

7.14. Low-level concerns should be reported in person to the DSL and/or Headteacher; to embed the culture of openness and transparency and to ensure that the Trust's values and expected behaviours are lived, monitored, and reinforced by all staff.

7.15. On receipt of a report of a low-level concern, the Headteacher/DSL will gather as much information as possible.

7.16. The Headteacher will decide the outcome of all low-level concerns (in consultation with the DSL and/or TSL if necessary). Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

Whistle Blowing

7.17. Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the school's arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of CYP.

7.18. If staff have such concerns; these should be raised with the DSL, Headteacher or TSL in line with the Trust's Whistleblowing Policy which is available on the website.

7.19. If staff feel unable to raise concerns with the Trust directly, they can contact:

- NSPCC Whistleblowing Advice Line. NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk.
- Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a childcare and education providers: Complaints procedure - Ofsted - GOV.UK
- General guidance on whistleblowing can be found via: Whistleblowing for employees: What is a whistleblower - GOV.UK

8. Record Keeping and Information Security

8.1. The Trust has a legal duty to act in line with data protection laws. There are data protection processes in place to ensure that we keep and process (manage) personal information about CYP, their families; staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with Meeting digital and technology standards in schools and colleges and Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK (see also Online Safety)
- Manage requests for access to personal information held by the Trust (known as subject access requests).

- Details of processes and how to request access to personal information held are outlined in The Data Protection Policy and Subject Access Request Procedure. See *Data protection in schools - Guidance ; Information Commissioners Office Guidance for Organisations and/or Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK)*

Storage and Management of Safeguarding Information (Child Protection files)

8.2. The designated Safeguarding Lead is responsible for ensuring the quality, maintenance and management of child protection files as well as using their Cpoms recording system to monitor themes and patterns of concern to inform and continue to improve the whole school approach to safeguarding.

8.3. The Designated Safeguarding Lead will ensure that child protection files meet the standards set out in Keeping Children Safe in Education Part 2 and Annex B and the Shropshire Transition in Education Guidance (safeguarding children at educational transition points); as well as to enable analysis of information held on the child protection file to inform their response[4] including:

8.3.1. Ensuring all safeguarding concerns, actions and decisions made and the rationale for those actions/decisions are clearly and factually recorded on the CYP's child protection file.

8.3.2. Ensuring the recording of professional opinion is clearly explained (for example concerns raised due to observations of established signs and indicators, or actions or decisions taken based on evidence-based assessment/tools; such as those outlined and linked in the local Framework for Action)

8.3.3. Where child protection files contain extensive historical information, ensuring that records are organised so that: Significant/key events that have had an impact on the CYP can be clearly identified and reviewed (*in line with SSCP Chronology guidance*) and that patterns of repeated concerns and/or cumulative harm[5] can be clearly identified.

- This will enable the Designated Safeguarding Lead to provide a structured summary of current risk, relevant context and ongoing support needs either as part of Sharing safeguarding information with others when responding to safeguarding concerns (for example referrals to Family Help or Child Protection) and/or when carrying out Transfer of child protection files and other safeguarding information to another education provider or for statutory Local Authority education notification processes (such as children missing education or who have become electively home educated).

Ensuring records are only accessed or shared with those who need to see it in line with data protection laws

8.4. Safeguarding concerns and responses for individual CYP are kept electronically and securely in each of the Trust's schools on CPOMS. Each school has a robust system in place whereby only DSLs are able to view safeguarding files for individual CYP.

8.5. If any of the Trust's schools are provided with Child Protection files when CYP are transferred into the school, they are stored securely and individually for each CYP, and are separate to a CYP's main pupil file. The DSL is responsible for ensuring the quality,

[4] Assessments: learning from case reviews | NSPCC Learning

[5] For further guidance see A Practitioner's Quick Guide to Cumulative Harm

maintenance, and management of child Protection files; as well as using the system to monitor themes and patterns of concern to inform and continue to improve the whole Trust approach to safeguarding.

Graduated approach to monitoring information

8.6. The DSL team will regularly review safeguarding chronologies in conjunction with other relevant senior leaders such as SENDCO, Attendance lead, Behaviour lead as part of the Trust approach to reviewing the whole CYP through planned pupil meetings using the **Belonging Framework: Appendix E.** This approach ensures that the needs of the whole CYP are considered and more targeted intervention can be considered.

8.7. Pupils will be reviewed regularly (no less than termly) using the staged approach within the framework and chronology of intervention and support will be recorded on student files.

Sharing Safeguarding Information

Data protection laws and principles allow us to store, share (and withhold) personal information as follows:

- Safeguarding information contained on the child protection file and any other information the Trust hold for safeguarding purposes is 'special category personal data'.
- 'Safeguarding of CYP and individuals at risk' is a processing condition that allows the Trust to share safeguarding information without consent where there is a good reason to do so; as further explained below.
- The Trust will not share personal data in circumstances where the 'serious harm test'[6] is met (where sharing would be likely to cause serious harm to the physical or mental health of any individual).

The Trust will seek the advice of the Data Protection Officer and the Information Commissioner's Office when necessary.

8.8. The Trust is proactive in sharing information internally and with others who are working with CYP and their families as early as possible; so that CYP can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse, neglect, exploitation and/or harm.

8.9. Staff are expected to share information with one another as part of their work in school about the needs and risks of CYP on a need-to know basis in line with the Trust's Safeguarding Statement so that CYP are kept safe and their welfare promoted. Staff are not permitted to share information with friends, family, or anyone in the local community outside of their work.

Sharing Information with Other Organisations

8.10. Staff should be familiar with and use the DfE's Information sharing advice for safeguarding practitioners.

8.11. Statutory guidance on the Information Sharing Duty will be used once is it published by the Government (which is expected in this academic year).

[6] A guide to the data protection exemptions | ICO

8.12. As part of work in partnership with parents and CYP; consent to share their information with others outside of school should always be sought from a CYP and their parent(s) unless it is not safe to do so. This includes where seeking consent would:

- Place the CYP at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

8.13. If a parent or CYP does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a CYP safe and promoting their welfare or if there is another legal basis to do so (such as information sharing requirements in statutory processes). When this happens, staff will explain to parents and CYP why the information still needs to be shared, unless it is not safe or possible to do so.

8.14. Decisions to share safeguarding information with other organisations will be overseen by the DSL (refer to DSL Response section of this policy). The Designated Safeguarding Lead will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including rationale for those decisions. This should include instances where referrals have or have not been made to another agency.

8.15. When deciding what information to share, consideration will be given to:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving organisation to know, and
- whether it is clearly presented and appropriately contextualised

8.16. Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

Transfer of Child Protection Files and Other Safeguarding Information

8.17. When a CYP leaves for a new education setting (including in-year moves), the DSL will arrange for the Child Protection file (and any additional information to assist the new setting to help safeguard and promote the CYP's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term.

8.18. Where the move is planned, the DSL will consider sharing information (which could include a conversation with the DSL in the new provision) in advance of the CYP leaving to help with the CYP's transition and to enable any help and support or protection they may need and/or where it would support assessment of risk to others in the school (for example where the CYP's behaviour causes a safeguarding concern). Safeguarding information should be used to support, not disadvantage, the CYP.

8.19. The file transfer will include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs. File transfers for

CYP potentially at greater risk of harm and/or whose files contain extensive historical information will include an Enhanced Transition Summary Form

8.20. The Trust will use the Shropshire Transition in Education Guidance (safeguarding children at educational transition points) | Shropshire Learning Gateway to guide the practice approach. This is shared separately to any CYP's main file and confirmation of receipt of the files should be gained (refer to Appendix B: File Transfer Record and Receipt).

8.21. If a CYP is absent from education or Electively Home Educated; schools share relevant information with the Local Authority as required by law (refer to Children Potentially at Greater Risk of Harm section of this policy). If the CYP leaves one of the Trust's schools and does not move to a new education setting; their Child Protection file (and any additional information as necessary) is transferred to the relevant Local Authority that they reside in line with the local protocol.

8.22. The Designated Safeguarding Lead will be notified of all CYP due to start at the school prior to or (in exceptional circumstances) on the date they start. The Designated Safeguarding Lead will be promptly notified of and review any safeguarding information shared to ensure they:

8.22.1. Understand key risks and needs, relevant context and any ongoing support needs for the CYP. Where information indicates a risk to others and/or the individual CYP (for example if a CYP's behaviour causes safeguarding concern) the Designated Safeguarding Lead will work closely with the School Behaviour/Inclusion Lead and other relevant Senior Leaders to respond and assess the risk to both the individual student and others in the school; to put in place a safety and support plan in place.

8.22.2. Identify any unclear, incomplete or missing information and seek clarification from the sending provider to ensure effective safeguarding. If the child protection file has not been received as required by Keeping Children Safe in Education Part 2 and Annex B; then the Designated Safeguarding Lead will use the SSCP Escalation/Resolution Of Disagreements Policy (or applicable Child Safeguarding Partnership Escalation Policy for the Local Authority area that the sending provider is based).

8.22.3. Share safeguarding information as required with key staff including Deputy Designated Safeguarding Leads, SENCOs or other staff who need to know. See also Children potentially at greater risk of harm.

9. Working in Partnership

9.1. In order to ensure all CYP in the Trust's schools are effectively safeguarded, and their welfare is promoted, we will work in in partnership with CYP, their parents and other agencies/partnerships as follows:

Children

9.2. CYP are taught how to keep safe; including how and when to share or report any worries or concerns they may have about their safety and wellbeing or that of others. Depending on the setting, the Trust encourages CYP to share and report worries and concerns via various methods such as tellus@ email addresses, worry boxes, pastoral departments.

For information relating to a specific school, please see Appendix D: School specific safeguarding procedures.

9.3. Staff are expected to build Trusted relationships with and work in the best interests of CYP in line with the Trust's Safeguarding Statement, and recognise, respond and report concerns as outlined in the Staff Safeguarding Concerns: Recognise, Respond, Report section of his policy.

9.4. The Trust actively seeks CYP's views of safety in schools through a range of activities appropriate to the setting including periodic pupil surveys and meetings with directors and/or local committee members. These are reviewed at Trust level to ensure we can support schools with helping CYP to feel safe within all settings.

Parents

9.5. The Trust recognises the importance of working together with and supporting parents to safeguard and promote the welfare of their CYP. This includes:

- Meeting with parents prior to CYP starting in EYFS to request information relating to the CYP's routines, likes/dislikes, special dietary requirements, intolerances/allergies and allergy actions plans and request parents inform schools of any changes to these throughout the school year.
- Communicating to parents how we keep CYP safe in the schools (including online). This policy is made available to all parents through each of the schools' websites and in paper copy on request. Each school ensures the existence of this policy is promoted at all appropriate conversations and/or events. If parents want to raise concerns or complaints about how the Trust keeps their CYP safe; they can do this using the Complaints Policy which is available on the Trust's and schools' website.
- Actively seeking parent views of safety in school through periodic parent surveys, events involving parents and meetings with directors and/or local local committee members.
- Encouraging parents to share and report worries and concerns about the safety and welfare of their CYP or any other CYP. Staff are expected to respond to any parents who raises worries or concerns to them either about their CYP or others in line with Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.
- Ensuring, through the DSLs, that schools work with parents to offer and enable support for CYP and their families; taking action to safeguard and promote their welfare (see DSL Response) in line with the local arrangements in the Local Authority where they live.
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority where they live and/or Enforcement Agencies.
- Providing parents with regular information, guidance and external support available to them by newsletters; specific pages on websites; running sessions for parents; signposting to external agencies.
- **For information relating to a specific school, please see Appendix D: School specific safeguarding procedures.**

Other Agencies/Partnerships

9.6. As the Trust operates in Shropshire, it engages and co-operates with the local safeguarding arrangements. The local safeguarding partnership is the Shropshire Safeguarding Community Partnership (SSCP). We also engage and co-operate with other Local Authorities (e.g. Telford and Wrekin), depending on where pupils live. The Trust engages and co-operates by:

- Ensuring the Trust effectively safeguards and promotes the welfare of CYP living in Shropshire in line with the DfE's Working together to safeguard children and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the SSCP Framework for Action. Where CYP do not live in Shropshire but attend a Trust school; we will work in line with the relevant local arrangements in their home area.
- Ensuring the Trust works with other agencies and comply with other pieces of relevant statutory guidance in safeguarding CYP potentially at greater risk of harm.
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure high quality education and support to CYP in Shropshire is provided.
- Participating in the local Operation Encompass Arrangements; an arrangement where police have a legal duty to notify schools if they have reasonable grounds to believe a CYP who attends their school may be a victim of domestic abuse. This includes all CYP connected to a household where they have attended a domestic abuse incident, CYP who are physically present at the incident, CYP not present and situations where a CYP might reside in another household both temporarily and permanently. This enables the Trust to provide appropriate emotional or practical support to a CYP who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of the Trusts participation in Operation Encompass School Operation Encompass – Shropshire Learning Gateway (shropshirelg.net)).

10. Teaching Children How to Keep Safe

10.1. The Trust recognises that educating CYP in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. There is a clear set of values and standards that provide opportunities for CYP to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through -

- The Trust Safeguarding Statement
- Relational Behaviour for Belonging Policy and Anti-Bullying Procedures
- Preventing Radicalisation (within this policy)
- The Trust approach to Online Safety
- The Trust Personal Social Health and Education and Computing curriculum and policies including the RHE/RSHE Policy. The Schools' RSHE programmes are compliant with Relationships and sex education (RSE) and health education - GOV.UK and developed to be fully inclusive of all ages and stages of development and consideration of CYP's needs including CYP potentially at greater risk of harm; and addresses issues as outlined Keeping children safe in education; Part 2: Opportunities to teach safeguarding.

10.2. The DSL, RHE/RSHE lead and other key members of the SLT (such as computing, Mental Health and SENDCo) will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in Trust schools.

11. Online Safety

11.1. The use of information and communication technology (ICT); is a vital part of the everyday functioning of life in the schools. The Trust also recognises the important role ICT plays in the lives of CYP and their families.

11.2. Whilst there are many benefits and strengths in using ICT; there are also a number of risks to CYP's welfare and safety in school when using internet enabled technology; which are summarised in the following categories:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as CYP with the intention to groom or exploit them for sexual, criminal, financial or other purposes**.**
- **conduct:** online behaviour that increases the likelihood of, or causes, harm for example, making, receiving and sending explicit images including those generated using AI and online bullying,
- **commerce:** illegal, inappropriate, or harmful online commercial activities that can compromise the health and wellbeing or security of CYP or others.

11.3. The Trust adopts a whole Trust approach to online safety which aims to safeguard and educate CYP and their families, staff, visitors, directors, and local committee members in the use and management of ICT (including the use of Artificial Intelligence, camera enabled; mobile and personal devices and the ICT systems in place). The Trust Online Safety policy outlines the approach to all required areas.

11.4. Where settings have Early Years provision, we ensure safeguarding procedures include all electronic devices with imaging and sharing capabilities, not just mobile phones and cameras. Schools also consider the use of screens with early years children. The Trust adheres to *Safeguarding children and protecting professionals in early years settings: online safety considerations - GOV.UK (www.gov.uk)* ***and*** *Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK* and Help for early years providers : Screen use

11.5. Although the direct responsibility of each school's DSL, The Trust ensures appropriate arrangements for filtering and monitoring and cyber security which adhere to the digital standards for filtering and monitoring. This is provided by Lightspeed for all schools. More information about the filtering and Monitoring practices can be found in the Online Safety Policy and Filtering and Monitoring Procedures.

11.6. Where there are online safety concerns involving identified CYP (including child-on-child abuse); staff will follow Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Safeguarding Response sections of this policy.

11.7. Reference to Cyber security arrangements that ensure information security (see also Record Keeping and Information Security), reduce the risk of disruption and mitigate safeguarding risks. These are in line with digital and technology standards for Cyber Security and take account of Schools | National Cyber Security Centre and Early Years practitioners: using cyber security to protect your settings | National Cyber Security Centre. Any school cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported in line with the Data Protection Processes to the Information Commissioners Office. Please also see Record Keeping and Information Security.

11.8. Where CYP are being asked to learn online at home, we follow advice from the Department of Education; Safeguarding and remote education. The Trust's approach to remote learning is outlined in the Remote Learning Policy.

11.9. The Trust reviews online safety arrangements at least annually to ensure that they meet the online safety standards outlined in Keeping children safe in education and Early years foundation stage (EYFS) statutory framework; Including ensuring adherence to:

- digital and technology standards for Filtering and monitoring and Cyber Security
- Generative AI: product safety standards
- Safeguarding children and protecting professionals in early years settings: online safety considerations
- Early Years practitioners: using cyber security to protect your settings | National Cyber Security Centre
- Help for early years providers : Screen use

The Trust records the outcomes of reviews including any risks. Risks and actions arising are added to the school evaluation and improvement action planning processes and reported to and overseen by Local Committees.

11.10. All staff, senior leaders, directors and local committee members are appropriately trained to enable them to ensure effective online safety arrangements. The Trust will respond to online safety incidents which indicate safeguarding concerns in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

12. Preventing Radicalisation

12.1. The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being drawn into terrorism. Schools fulfil this duty by:

- Promoting fundamental British Values as part of Trust values and curriculum (refer to relevant policies).

- Ensure that all schools provide a “safe space” for CYP to understand and discuss sensitive topics, those linked to radicalisation and terrorism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.
- Be alert to and identify CYP who may be susceptible to radicalisation into terrorism and where it is assessed as appropriate by the Designated Safeguarding Lead; make a Prevent referral (in line with the local Preventing Terrorism Processes)
- Monitor and report any hate-based behaviour as part of the Behaviour and child-on-child Abuse (including harassment and violence) Policies (Hate related incident reporting processes can be found here).
- Outline in the Online Safety and Relationship Sex Health Education Policies (include any other curriculum subjects related policies) how CYP are being safeguarded from being drawn into terrorism.
- Ensure that hosting external speakers or visitors that attend school premises are suitable and appropriately supervised (please also refer to ‘Visitors’)
- Assess the risk of CYP being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in schools’ evaluation processes; and inform their approach to online safety (including filtering and monitoring and cyber security arrangements).

12.2. The Trust has a nominated DSL as the Prevent Lead who is responsible for liaising with the regional Prevent Lead from the DFE and sits on the local Prevent Board to receive regular updates which are then disseminated across the schools.

12.3. The Trust regularly reviews the adherence to the Prevent Duty and ensures that schools review the practice through a prevent risk assessment annually. Any actions arising from the assessment are included in school evaluation and improvement action planning processes. These are reported to and overseen by the school’s LGC.

12.4. All staff, senior leaders, directors and local committee members are appropriately trained (see Appendix A Professional Development and Support Minimum Training Requirements) to enable them to ensure that all CYP, particularly those who may be susceptible to extremist ideology and radicalisation are effectively safeguarded. The Trust responds to CYP who are identified as being susceptible to an extremist ideology in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

12.5. In addition to the annual training, key DSLs across the Trust have received Prevent ‘Train the Trainer’ CPD delivered by the DFE regional Prevent Lead to further improve the capacity for continued CPD across all staff.

13. Children Potentially at Greater Risk of Harm

13.1. The Trust recognises that whilst all CYP should be protected, some groups of CYP are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a CYP falls into multiple groups above; this potentially further increases their vulnerability.

Children Who Need Local Authority Social Care (Child in Need and Child Protection Plans).

13.2. If a CYP needs Local Authority social care, as a child in need or because of child protection concerns, they are more vulnerable to harm/further harm and may face barriers to attendance, learning, behaviour and mental health. The Designated Safeguarding Lead will be informed (if they are not already aware/have referred a child) when a CYP needs Local Authority Social Care. They will be a part of the core group of agencies (known as the core group) to so that decisions can be made in the best interests of the CYP's safety, including ensuring that the CYP's educational outcomes are promoted. We ensure that appropriate staff members have access to the information they need in relation to a CYP's looked after legal status, contact and care arrangements to ensure that they are aware of their greater level of vulnerability and ensure their educational outcomes are promoted.

13.3. The schools work closely with external agencies to ensure the appropriate support is in place. Please refer to the specific school policy for further details.

Looked After Children and Previously Looked After Children.

13.4. The most common reason for CYP becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in their own and their family's lives. They are more vulnerable to harm/further harm and may face barriers to attendance, learning, behaviour and mental health.

13.5. All schools within the Trust ensure that appropriate staff members have access to the information they need in relation to a CYP's looked after legal status, contact and care arrangements to ensure that they are aware of their greater level of vulnerability and ensure their educational outcomes are promoted. All Trust schools have an appointed Designated teacher who works with the DSL and the local authority (including allocated social worker and the Virtual School) to promote the educational achievement of registered pupils who are/have been looked after.

13.6. The name of each designated teacher will be in the Appendix D: school specific safeguarding procedures.

13.7. Please also refer to the DfE statutory guidance - Designated teacher for looked after and previously looked after children.

Children who attend Alternative provision

13.8. The cohort of pupils in Alternative Provision often have complex needs, and the Trust are aware of the additional risk of harm that CYP accessing alternative provision may be vulnerable to. Where schools place a CYP with an alternative provision provider, the Trust continues to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the CYP.

13.9. The Trust ensures safeguarding arrangements at any Alternative Provision (whether school or non-school) that the schools' commission are effective and compliant with:

- Keeping children safe in education (Part 2)
- Alternative Provision .
- Non-school alternative provision: voluntary national standards.

13.10. The Trust refer to and follow the Local Alternative Provision processes; seeking guidance from the Education Access Service (Attendance/Inclusion Teams) | Shropshire Learning Gateway when needed.

13.11. The Trust also offer internal alternative provision at two Trust schools to other schools within the Trust. If safeguarding concerns arise for any CYP that the Trust place or is placed with the Trust in alternative provision; the Trust ensure that there are robust procedures are in place between the Trust and the alternative provider/commissioning school including:

- Staff in the alternative provision report concerns to their DSL. Where the Trust are acting as the alternative provider, staff will adhere to Staff Safeguarding Concerns: Recognise, Respond, Report.
- The DSL for the alternative provision will share and discuss the concern with the commissioning school's DSL to agree the Designated Safeguarding Lead Response
- The DSL for the commissioning school will ensure that they share any relevant safeguarding concerns and if necessary, include the DSL for the alternative provision in the Designated Safeguarding Lead Response.
- Both the commissioning school and the alternative provider will share a child protection file for the CYP for the duration of the placement in line with requirements in Keeping Children Safe in Education (Part 2 and Annex A) and Record Keeping and Information Security.

Children who are absent from or are not in receipt of full-time education

13.12. CYP aged 5-16 are legally entitled to a full-time education, suitable to any special educational and/or medical need. Education is essential for CYP's progress, wellbeing and wider development and being in school is a protective factor against wider harms including exploitation.

13.13. CYP being absent from education including those accessing early years provision for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect (including Educational Neglect) or Child exploitation; as well as other needs and in line with Keeping Children Safe in Education, patterns of or prolonged absence will be considered a safeguarding concern. Trust schools use the Trust Belonging Framework to link concerns in Attendance, Behaviour, Learning and Mental Health and Wellbeing with safeguarding to ensure they are accurately considering the whole-child when determining appropriate action/support needed. The Trust's response to persistently absent pupils ensures that schools are proactive in safeguarding CYP and identifying indicators of abuse as well as helping to prevent further missed education in the future.

13.14. Please refer to each school's Attendance policy and Children with Health Needs who Cannot Attend School policy for further information about the Trust's process and procedures relating to absence.

13.15. Each school closely monitors attendance, absence and exclusions and their DSL will take appropriate and proactive action, including where necessary notifying the local authority, particularly where CYP go missing on repeated occasions, on an increasing basis, and/or are missing for periods during the school day. For school-specific procedures where a CYP goes missing during the school day, both on and off-site, please refer to their school Appendix D: School specific safeguarding procedures.

13.16. The Trust refers to and uses Statutory Guidance on Children missing in education to ensure they comply with the duties regarding children missing education. This includes notifying the Local Authority in line with the Shropshire Council Children missing education process when removing a CYP from the school roll at standard and non-standard transition points.

Children Who are Electively Home Educated.

13.17. Many home-educated CYP have an overwhelmingly positive learning experience. The Trust would expect the parents' decision to home educate to be made with their CYP's best interests at the heart of the decision. However, this is not the case for all, and home education can mean some CYP are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs. When a parent expresses an intention to deregister their CYP to electively home educate them, schools will follow local Elective Home Education process and policy and DfE Elective home education guidance.

13.18. Schools will work closely with parents and the local authority to ensure this is in the best interests of the CYP and will always seek to meet with parents to discuss the request to ensure that they have considered what is in the best interests of each CYP. Where a CYP has special educational needs or disability, and/or has a social worker, schools will liaise with the relevant departments and professionals to coordinate a joined up discussion.

13.19. Where parents need local authority consent to home educate their CYP and/or elective home education may not be in the CYP's best interests and/or increase their risk of abuse, neglect, exploitation or harm, this will be treated and recorded as a safeguarding concern.

13.20. In these circumstances the Designated Safeguarding Lead will work closely with the Headteacher, the SENCO (if the CYP has special educational needs) and Education Access Service to review the decision to ensure the parents/carers have considered what is in the best interests of each CYP.

14. Children whose behaviour causes concern

14.1. It is important that CYP in Trust schools know and understand how the Trust expect them to behave. This includes teaching them how to behave in a safe and healthy way within, outside and after school; and ensuring that school is a safe place where all CYPs feel safe and able to learn.

14.2. The Relational Behaviour for Belonging Policy outlines the expected standards of behaviour for CYPs; as well as the systems in place to create a safe school environment including:

- The Restrictive interventions, including use of reasonable force, in schools ,
- Searching, screening and confiscation,
- The use of Mobile phones in schools

- Preventing all forms of bullying and the approach to preventing and responding to child abuse, which is also outlined at Appendix C: Child-on-Child Abuse (including harassment and violence) Procedures
- Use of/referral to local education inclusion arrangements and/or hate relating incident reporting processes.).
- It further outlines how the school will support and respond to CYP with additional needs (including those with Special Educational Needs and Disabilities or other Children potentially at greater risk of harm); and CYP who are suspended or at risk of permanent exclusion.

14.3. Behaviour that causes concern can be a sign or indicator that a CYP has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse, neglect, exploitation, harm or some other form of adverse experience[7] in their life. Staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report where a CYP's behaviour also indicates a safeguarding concern; including being alert to behaviour that causes concern outside of school (including online). This policy and procedures will be followed when there are concerns that a CYP:

- Is showing early signs of abusive, violent and/or harmful behaviours. These behaviours may be physical, sexual or emotional and could be directed towards CYP or adults (including staff). It could also include where a CYP expresses intent to cause serious harm or kill others. Where behaviour is directed towards other CYP, Appendix C: Child-on-Child Abuse (including harassment and violence) Procedures apply.
- Is regularly/repeatedly receiving consequences; including being repeatedly removed from the classroom, experiencing multiple suspensions, and/or is at risk of being permanently excluded.
- Is carrying or using a weapon (or expressing intent to do so)
- 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 at risk of being radicalised into terrorism (see also Preventing Radicalisation)
- Is frequently missing/goes missing from education (including during school time), home or care
- Has signs of self-harm, suicidal ideation/risk of suicide (see also Children requiring Mental Health Support)
- Is misusing alcohol or other drugs

14.4. As part of the Designated Safeguarding Lead Response, the Designated Safeguarding Lead will work closely with the School Behaviour/Inclusion Lead and other relevant Senior Leaders to assess the risk to both the individual student and others in the school; to put in place a safety and support plan. Where it is necessary to keep CYP safe while a safeguarding response is ongoing (for example, where an allegation of harm has been made by one CYP against another), the school may separate the CYP concerned. As a non-disciplinary safeguarding measure, and in exceptional circumstances, this may include temporarily requiring a CYP not to attend the school premises, in line with the DfE's statutory guidance on suspension and permanent exclusion (including student

[7] See Understanding trauma and adversity | Resources | YoungMinds for further information.

movement). Any such measure will be proportionate, kept under review and recorded, and the CYP and their parents will be informed. If applicable, they will follow:

- Appendix C: Child-on-Child Abuse (including harassment and violence) Procedures and/or
- Keeping Children Safe in Education: Part 1 & Annex A: Serious Violence (including where there are concerns about the CYP carrying or using a weapon; or expressing intent to do so) and/or
- The graduated approach set out in The Trust Belonging Framework.
- Local hate related incident reporting processes.

Safeguarding Children with medical conditions

14.5. The Trust recognises the importance of ensuring early support for CYP with medical conditions to ensure that their welfare is promoted and they are effectively safeguarded.

14.6. The Trust supports CYP with medical conditions, including allergies and mental health needs through clear school arrangements that promote their health, safety and inclusion. Relevant information is obtained from parents and carers, recorded accurately, shared with appropriate staff on a need-to-know basis, and reviewed when needs change. Staff follow agreed procedures and relevant staff complete appropriate training for:

- managing allergies and dietary requirements, including ensuring safer eating,
- maintaining first aid arrangements and responding to medical incidents
- administering medicines (where necessary),

14.7. Where appropriate and proportionate individual health care plans and CYP's education is adapted (see also Children who are absent from or are not in receipt of full-time education) to ensure we effectively support CYP with medical conditions. This may also be in place alongside support provided as part of a CYP's special education need or disability.

14.8. Further details as to procedures for CYP with medical conditions are outlined in:

- Supporting pupils with medical conditions policy that is in line with Supporting pupils with medical conditions at school - GOV.UK, and the local Inclusion Pathway (includes Section 19) and Early years foundation stage (EYFS) statutory framework - GOV.UK
- Allergy Safety Policy that is in line with Allergy safety in schools - GOV.UK

14.9. Where there are concerns that a CYP's medical needs are not being effectively managed or responded or indicates risk of suffering abuse, neglect, exploitation and/or harm (whether from parents/carers or other people outside of their family including staff); staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report and (in the case of staff Ensuring safe staff). The Designated Safeguarding Lead Response will work closely with relevant senior leaders to Work in Partnership and in line with the Framework for Action to ensure that the CYP is effectively safeguarded. Where applicable safeguarding arrangements for Children who attend Alternative Provision will also apply.

Children Requiring Mental Health Support

14.10. Mental health problems can, in some cases, be an indicator that a CYP has suffered or is at risk of suffering abuse, neglect or exploitation and/or harm. CYP who have mental health needs may need additional support to avoid their safety and welfare being compromised. **Only** appropriately trained professionals should attempt to make a diagnosis of mental health problem. However, the Trust understand that they have an important role to play in:

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

14.11. If there are concerns that a CYP's mental health needs may place them at risk of harm (for example concerns about suicidal ideation or attempts, self-harm, eating disorders etc); then staff will adhere to Staff Safeguarding Concerns: Recognise, Respond, Report.

14.12. Each Trust school has a senior mental health lead who is a member of or supported by the senior leadership team. The name of each lead can be found in Appendix D: School specific safeguarding procedures. Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK (www.gov.uk)

Children with Special Education Needs and/or Disabilities.

14.13. CYP with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges both online and offline.

14.14. The Trust recognises that additional barriers can exist when recognising abuse and neglect in this group of CYP and ensure staff in schools are trained to be aware of such vulnerabilities. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the CYP's impairment without further exploration
- these CYP being more prone to peer group isolation or bullying (including prejudice-based bullying) than other CYP,
- the potential for CYP with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs,
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,
- the need for intimate care for some of these CYP can lead to vulnerabilities
- that these CYP are more likely to be dependent on adults for care, and
- these CYP may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

14.15. Schools have trained pastoral teams who work closely with both the SENDCOs and DSLs to ensure appropriate support and monitoring is in place. These teams also work with external professionals and signpost families to the SEND local offer as per the *SEND code of practice* : https://next.shropshire.gov.uk/the-send-local-offer/.

14.16. For more information on Trust schools' specific support for pupils with SEND please refer to the Trust SEND policy and schools' SEN information reports.

Children who are lesbian, gay, or bisexual

14.17. The fact that a CYP or a young person may be lesbian, gay bisexual is not in itself an inherent risk factor for harm, online and offline, however, CYP who are in these groups can sometimes be targeted by other CYP. In some cases, a CYP who is perceived by other CYP to be lesbian, gay or bisexual can be just as vulnerable as CYP who already identify within these groups.

14.18. The Trust Relational Behaviour for Belonging Policy and Appendix C: Child-on-Child Abuse (including harassment and violence) Procedures further outlines how the Trust prevent and respond to bullying and other forms of child-on-child abusive behaviour. The Trust will also, where appropriate use, and follow hate relating incident reporting processes.

14.19. All schools and staff will ensure inclusivity of CYP who may identify within these groups and provide both a safe space and Trusted adults for pupils to be able to share their concerns. Schools teach this topic sensitively as part of the statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education curriculum.

Children who are questioning their gender

14.20. In recent years, there has been an increase in the number of CYP 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 common for CYP to engage in activities that are less typically associated with their sex. Sometimes young CYP also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

14.21. The Trust will not initiate any action to make changes or put support in place to facilitate a CYP presenting as the opposite biological sex (known as "social transition") unless a CYP's parent or carers have been involved in the decision (except when involving them would increase risk to the CYP).

14.22. Keeping Children Safe in Education (part 2), including if a Designated Safeguarding Lead Response is required will be followed relating to:

- Sport
- Regulations and safeguarding requirements relating to school premises
- Boarding and residential accommodation (including educational visits)
- CYP who are questioning their gender.

14.23. Staff are expected to report the following to the Designated Safeguarding Lead:

- a CYP requests changes or support for social transition **and** their parent or carer is not aware or already involved in the decision.
- a CYP has confided in a staff member, or it is known that they are questioning their gender **but** have not made a request for changes **and** the staff member has

concerns for the CYP's safety or wellbeing (if there are no safeguarding concerns, there is no reason to report to the DSL)
- a parent of carer requests changes or support for social transition **and** there are concerns for the CYP's safety or wellbeing.

14.24. CYP who are questioning their gender can sometimes be targeted by other CYP. In some cases, a CYP who is perceived by other CYP or adults to be engaging or behaving in ways that are less typically associated with their sex can be just as vulnerable.

14.25. The Trust Relational Behaviour for Belonging Policy and Appendix C: Child-on-Child Abuse (including harassment and violence) Procedures further outlines how the Trust prevent and respond to bullying and other forms of child-on-child abusive behaviour. The Trust will also, where appropriate use, and follow hate relating incident reporting processes.

Young Carers[8]

14.26. Young carers are CYP who have everyday caring responsibilities for a family member. CYP and/or their family may not share that they have such caring responsibilities. The care and support a young carer provides for their family is incredibly important; but the additional responsibility this places on a CYP can also impact their attendance, attainment, behaviour and wellbeing.

14.27. The Trust expect staff to be alert to the signs that a CYP might be a young carer. Signs might include noticing that a CYP[9]:
- Seems anxious about being away from home
- Is often tired or distracted
- Finds it difficult to fully engage with their education. For example, has irregular attendance (including absence/lateness); not completing homework; unable to take part in after school activities.
- They are carrying out responsibilities beyond what's typical for their age or level of development
- Worries about a parent/carer or sibling's wellbeing
- Withdraws socially or avoids making plans

14.28. Where there are concerns that a CYP is a young carer who may need extra help and support; staff are expected to follow Staff Safeguarding Concerns: Recognise, Respond, Report. As part of the Designated Safeguarding Lead Response; the DSL will consider enabling the CYP and family to access local support for Young carers.

[8] For further information, please see: Young carers | Shropshire Council

[9] 'Who Am I? Young carers poem and animation

Children under 5, particularly babies and those not yet born

14.29. Children under 5 years of age are particularly vulnerable to abuse and neglect[10]. Babies (under the age of 1 including those not yet born) are more vulnerable to experiencing serious harm in certain circumstances.[11]

14.30. As part of some of the schools' nursery provision, schools care for children under 5 and follow the Early Years Foundations Stage Statutory Framework.

14.31. The Trust consider the safety and welfare of every child within a family; even if they do not attend Trust schools/settings (see Safeguarding all children and Working in Partnership). As such, schools ensure that they are alert to families who are pregnant and/or have children under the age of 5, including paying attention to any indications that children in this group may be at risk.

14.32. Where concerns about children in this group arise; staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report. As part of their response, Designated Safeguarding Leads will ensure they refer to specific regional procedures as applicable including:

- Pre-Birth
- Bruising in Babies and Children

Children who are Black, Asian, Mixed Heritage or from other minoritised ethnic communities.

14.33. CYP who are Black, Asian, Mixed heritage or from other minoritised ethnic communities (including Gypsy Roma and Travelling communities) are more likely to experience racism, bias, stereotyping or cultural misunderstanding. We recognise that additional barriers can exist when recognising and responding to abuse, neglect, exploitation and/or harm for CYP in these groups.[12]

14.34. Trust schools will act in line with the Safeguarding Statement; as well as being aware of when bias (conscious or unconscious) may affect how they work with CYP and their families in this group. For example,

- Care should be taken to ensure CYP in these groups are not treated as older, more mature or resilient than they are (known as adultification).
- Working in partnership to understand how a CYP's culture and identity shapes what daily life looks and feels like for them.
- Schools will also, where appropriate, use and follow hate relating incident reporting processes.

15. Child-on-Child Abuse (including harassment and violence)

15.1. As set out in the Trust's Safeguarding Statement; the Trust will not tolerate the abuse of CYP. This includes where CYP abuse other CYP (Child-on-Child abuse including harassment or violence) or use words or actions which downplay or could (if not

[10] Early years safeguarding and child protection | NSPCC Learning

[11] Vulnerable babies | Child Safeguarding Practice Review Panel

[12] See Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning and Black, Asian and Mixed Heritage children | Child Safeguarding Practice Review Panel

responded to) lead to such abuse[13], as this can lead to a culture of unacceptable behaviour and an unsafe environment for CYP. In worst case scenarios this can create a culture that normalises abuse, leading to CYP accepting it as normal and not coming forward to report it.

15.2. The Trust works to ensure that no child-on-child abuse takes place in its schools. However, the Trust understands the scale of child-on-child abuse and that CYP telling staff that they are experiencing abuse from other CYP cannot be relied on. Staff should understand that even if there are no reports in their school, this does not mean CYP-on-CYP abuse is not happening.

15.3. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their Professional Development and Supervision, which do not just rely upon CYP telling someone. Staff across the Trust are expected to follow Appendix C: child-on-child Abuse Procedures (including harassment and violence).

15.4. Each of the Trust's schools monitor patterns of child-on-child incidents including those involving abuse, to ensure that schools are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps them to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and Trust responses to it are reported to and overseen by each school's LGC.

15.5. This section should be read in conjunction with the Trust Relational Behaviour for Belonging Policy section on bullying behaviour as evidence indicates that perpetrators of such behaviour are likely to have previously been victims of abuse, neglect, exploitation and/or harm themselves. In most instances, schools will use the Trust Behaviour Policy to support the conduct of pupils towards each other, however where behaviour is considered to be abusive or indicate potential safeguarding concerns, staff will raise concerns to the DSL and both the victim and perpetrator must be reviewed as victims with appropriate support provided. Where it is necessary to keep the CYP involved safe while a response is ongoing, the school may separate the CYP concerned; where proportionate, and as a non-disciplinary safeguarding measure, this may include temporarily requiring a CYP not to attend the premises in line with the DfE statutory guidance on suspension and permanent exclusion (see also Children whose behaviour causes concern).

[13] Words or actions which downplay include describing or accepting "banter", "just having a laugh", "part of growing up" or "boys being boys".

16. Staff Safeguarding Concerns: Recognise, Respond, Report

Be alert and curious!
Pay attention to possible **signs or indicators** of abuse/harm to the CYP from the CYP themselves or others either from your own observation or what the child/others tell you. Consider:
Appearance
Behaviour
Communication.
Do not just rely on a CYP telling you (there are lots of reasons why they won't)

16.1. Any CYP in any family could become a victim of abuse, neglect, exploitation and/or harm. Abuse and safeguarding issues are complex; and can often involve a CYP experiencing overlapping issues or types of abuse.

16.2. Staff should always maintain the attitude that abuse "could happen here". Staff should be particularly alert to Children potentially at greater risk of harm and vigilant in identifying the signs and indicators which could indicate a concern that a CYP is being or could be at risk of abuse/harm.

16.3. As well as maintaining their Professional development and accessing support; staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: Keeping Children Safe in Education : Part 1 and Annex A. and SSCP - Contacts and Definitions.

16.4. **Signs and indicators** of concern may be evident in spaces and places where CYP spend time (including when online). They may be present in the CYP or others around them (including adults or CYP); in their:

- **Appearance**
- **Behaviour**
- **Communication**

16.5. Signs and indicators can be recognised by staff through:

- **Concerns shared directly by a child**: *Staff must not rely* on pupils telling them they are experiencing abuse, neglect or exploitation. CYP may not recognise, feel ready, know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with the Trust's Safeguarding Statement; and use professional curiosity and skills in developing Trusted and supportive relationships in their everyday work with CYP.
- **Observations**: In person or online (including online behaviour in school) of a CYP or someone else (for example a parent, someone working or visiting the school).
- **Concerns shared by others**: either verbally or in written communications. This could be parents; other CYP; other staff members or other adults who may be working in or with the school or individual CYP.

16.6. **Other systems in place**: For example, online filtering and monitoring systems and reporting or information from other agencies through working in partnership etc.

16.7. There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the CYP is at risk of or experiencing abuse. Signs and indicators could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need for early help and support. In such circumstances, staff are still expected to respond in line with this policy.

17. Respond

Ensure the immediate safety of the CYP potentially at risk.

If there is immediate danger;

Take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and refer child protection concerns)

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or Appendix C: Child-on-Child Abuse Procedures as applicable).

Seek views/gather relevant information (if safe to do so).

Remember: LISTEN (don't investigate), **REASSURE** (don't promise) and **EXPLAIN** you will be reporting the concerns.

Immediate safety

17.1. If a CYP is in immediate danger; staff must take individual action as necessary to keep the CYP, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow Do you think a child is being harmed or is at risk? | Shropshire Council)
- Work in line with the Relational Behaviour for Belonging Policy and Restrictive interventions, including use of reasonable force, in schools guidance.
- Report any allegations of harm by adults in a position of Trust or unsafe practices in school in line with the Ensuring safe staff.

Other relevant policies/processes

17.2. Staff may need to follow other school safeguarding policies/processes (see Linked Policies) as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the CYP and any other CYP who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse; Appendix C: child-on-child Abuse Procedures should be referred to.

Injuries

17.3. Each of the Trust's schools request parents notify the school of any accidents or injuries to their CYP before attending school. The school will make a written record of the notification along with any injuries the CYP may have. Should a CYP receive any injuries during school time; staff will follow the accident reporting and first aid procedures.

Seek views and gather information from the CYP and others.

17.4. Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- CYP (where appropriate and depending on the circumstances and their role with CYP);
- any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see Record Keeping and Information Security section of this policy)
- Their parents (if necessary and depending on the circumstances and their role).

17.5. Seeking views from the CYP/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to When Concerns are Directly Shared by a CYP section below.

17.6. Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the CYP at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

17.7. If needs for help and support are identified; parents and CYP should always be asked for their consent to share information with other organisations individuals so that help and support can be provided to them. If consent is not given; staff should follow guidance in the Recording Keeping and Information Security: Sharing Safeguarding Information with Organisations section in this policy.

17.8. Any uncertainty about seeking views should be discussed with the DSL. Decisions to share safeguarding concerns with other organisations without consent will be reported to and overseen by the DSL.

17.9. If a CYP is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the CYP may be expressing their views and feelings through their behaviour and use communication tools to help the CYP share their views such as Emotional Literacy Support Assistants, Makaton/BSL, Lego therapy and Drawing and Talking.

When Concerns are Directly Shared by a CYP

17.10. CYP are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

17.11. When CYP share the details of or feelings about abuse, neglect or exploitation, the process of sharing can sometimes take time. CYP may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the CYP may share in the

appearance, behaviour or other forms of communication (refer to 'Recognise' earlier in this section).

17.12. It takes a lot of courage for a CYP to share that they feel unsafe or are experiencing abuse, neglect, exploitation and/or harm. There are many reasons why CYP do not share their experiences (for example, uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).

17.13. When CYP are sharing their concerns; staff should:

- **Listen to the child**: Please refer to this NSPCC poster.
- **Remain calm**: the CYP may stop sharing if they feel the staff member is upset or shocked by what the CYP is telling them.
- **Explain it can't be a secret**: Staff must explain to the CYP that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the CYP feels safe and can continue to Trust you and other staff.
- **Reassure**: offer comfort to the CYP(physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the CYP is telling you or reprimand them if they decide not to share or for not telling you before.
- **Seek the child's views**: use questions or communication tools that help the CYP to share from their own point of view. Gather information: do not investigate or assume what is happening to the CYP.
- **Explain what will happen next**: If you don't know everything that is going to be done, tell the CYP that you will make sure that they are kept informed.
- **Report and record** the conversation immediately as outlined in the Reporting concerns section.
- **Seek support** if you feel distressed from the DSL team. Support can also be sought from members of the Trust's HR team and the Trust support service VIVUP.

Where there is an immediate risk of significant harm:
Report in person to the Designated Safeguarding Lead as soon as possible.
Record your concerns, decisions, actions and outcomes on the safeguarding recording system.
If concerned about a member of staff or someone else in the school; report in line with Ensuring safe staff.

18. Report

Report to Designated Safeguarding Lead

18.1. All safeguarding concerns must be reported to the DSL as soon as they are recognised and after the initial response to the CYP and others. Staff are expected to verbally report their concerns to the DSL.

18.2. Where concerns involve an allegation of harm or a low-level concern about someone working in or at the school; staff must follow Ensuring safe staff.

Record concerns

18.3. All safeguarding concerns must be recorded by the staff member in writing on the secure platform CPOMS and the DSL alerted to the concern.

18.4. Where physical injuries to a CYP form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map (within the CPOMS incident log).

18.5. Each safeguarding concern record should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- any action taken, decisions reached with an explanation as to why the action/decision was taken (rationale) and the outcome.

18.6. If staff are unsure of the recording requirements staff should seek advice from the DSL.

19. Designated Safeguarding Lead Response

19.1. Safeguarding concerns can be raised by staff as above; but may also be raised to the Designated Safeguarding Lead (DSL) by:

- CYP, parents, or visitors to the school.
- Other agencies (see Working in Partnership section of this policy)
- The school's ICT filtering and monitoring systems.

19.2. The DSL will:

Consider and Assess the Concern.

19.3. Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The DSL will use and refer to the following:

- Working Together to Safeguard Children 2026 (particularly Chapters 1 and 3)
- Keeping children safe in education
- SSCP Framework for Action
- Other relevant local tools and pathways (West Midlands Procedures)
- If applicable Appendix C: Child-on-Child Abuse Procedures
- If applicable Understanding and identifying radicalisation risk in your education setting
- When to call the Police - information for schools

Decide on What Action to Take.

19.4. Once the concern has been considered and assessed; the DSL will decide on action(s) to be taken. They may wish to delegate actions to other members of staff, in the best interests of the CYP. The DSL will assist the Headteacher with decisions to relating to staff in school.

19.5. In making decisions, the DSL will work in partnership with the Headteacher; relevant staff/senior leadership team in line with their Roles and Responsibilities and any other organisations as appropriate (see Working in Partnership and Record Keeping and Information Security). Actions could include one or more of the below

- **Manage internally/provide every day advice and support**: in alignment with school policies and processes and the SSCP Framework for Action, offering support to the CYP and their family through the school pastoral support (Universal/School Early Help) offer in a way which addresses the needs/risks identified. This may also include actions to make locations/infrastructure in school (including online) safer; adapt the curriculum to ensure the school is teaching children how to keep safe, or Working in Partnership.
- **Offer Extra Help/Community Based Early Help** in line with local Framework for Action and/or use of/referral to local education inclusion arrangements; schools will consider offering other support or intervention beyond internal management. This could include offering and/or referring a CYP and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of CYP's wishes and feelings.
- **Offer and refer to Family Help:** in line with local Framework for Action and/or use of/referral to local education inclusion arrangements. Where is identified that a CYP and their family would benefit from a co-ordinated, multi-agency response and there are clear needs/risks we will offer and refer to Family Help. This could include offering and/or referring a CYP and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of CYP's wishes and feelings.
- **Raise Child Protection Concerns** in line with local Framework for Action and (if applicable) reporting requirements set out Keeping children safe in education.
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a CYP; concerns will be reported to the Police. The law may also require us to report concerns that crimes have been committed by others where CYP have not been directly involved (for example in the interests of community safety). The Trust will follow the Sharing safeguarding information with others procedures, including using: Sharing personal data with law enforcement authorities | ICO

19.6. Where there is possible criminal behaviour by a CYP (including in circumstances of child-on-child abuse); schools will take account of When to call the police: guidance for schools and colleges.

19.7. Other local referral processes will also be followed as applicable: including referring to relevant multi-agency forums and processes as outlined in relevant local tools and pathways (e.g. to Prevent Radicalisation; ensure Online Safety; respond to Domestic abuse.

19.8. **Report Hate-related behaviour to the Local Authority.** Schools will follow hate relating incident reporting processes where any behaviour is perceived by the reporting

person or any other person that the incident was motivated by hostility or prejudice (or perceived hostility or prejudice) based on another person's:

- Sex
- Race
- Religion
- Sexual orientation
- Disability
- Transgender identity

In these circumstances they may also request the support of the Victim Support IamMe! programme to prevent and respond to hate-related behaviour.

Record Actions, Decisions, and Outcomes.

19.9. Schools will record everything on the Child protection file and in line with Record Keeping and Information Security. This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see Working in Partnership). The Designated Safeguarding Lead will keep detailed, accurate, written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency.

Manage and Oversee any Ongoing Response.

19.10. Once the initial actions are taken, the DSL will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a CYP. Where this is decided, they will ensure that the school works in partnership with the child; parents, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

19.11. The SSCP Escalation/Resolution of Professional Disagreements Policy will be used to challenge, resolve and if necessary, escalate any concerns the school may have when working with other agencies in safeguarding children.

20. Linked Policies and Procedures

Relational Behaviour for Belonging Policy including Anti Bullying Strategy
Staff Behaviour Policy / Code of Conduct
Whistleblowing
Health & Safety
Allegations of Abuse against staff
Attendance
RSHE
Complaints
SEND
Remote Learning
First Aid
Online Safety, including staff use of mobile phones/ devices with imagery and sharing capacity.
Risk Assessments
Safer Recruitment
Disciplinary and grievance

Intimate Care
Data Protection/GDPR Guidance

Appendix A Professional Development and Support Minimum Training Requirements

All School Staff (including Volunteers)

Activity	Frequency
Receive information on school safeguarding arrangements and procedures as outlined in Keeping children safe in education	Induction or when arrangements/procedures are updated.
Complete annual online update training including assessment quiz.	Biannually to alternate with Local Safeguarding Awareness Training (see below)
Read Keeping children safe in education (KCSiE): **All Staff**: Part 1; Part 5 and Annex A. **Senior Leadership Team:** Entire document **EYFS Staff & Senior Leadership Team:** Section 3 Early years foundation stage (EYFS) statutory framework(group and school based providers)	Induction then annually (in Autumn Term or when updated).
Complete Local Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse to include harassment and violence) concerns	Induction and then every 2 years
Teaching staff (including early years) only: Complete FGM training appropriate to role	Induction and then every 2 years
Complete Prevent Awareness Training appropriate to role	Induction and then annually.
Complete Cyber Security Training	Induction and then annually
Complete Online Safety Training	Induction and then annually
Receive regular national and local safeguarding updates (including those relating to online safety) to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting.	Termly updates will be provided by the Trust's Safeguarding consultant. This may be done via email.
Non-DSL Senior Leaders; including the Headteacher: Complete Safeguarding Training to equip them with the knowledge to carry out their senior Roles and Responsibilities	Induction and then every 2 years

DSLs (including DDSLs)

Activity (in addition to all staff above)	Frequency
Complete Schools DSL Training to a standard as outlined in KCSiE Annex B and EYFS Annex C	On induction in role and then every 2 years
Read Keeping Children Safe in Education in its entirety.	Induction into role then annually (in Autumn Term) or when updated.
Complete Prevent Referral Training	On induction and then every 2 years
Complete Operation Encompass Online National Key Adult Training	At least once and before Operation Encompass referrals can be received.
Complete Brook Traffic Light Training to support assessment of children's sexual behaviour (including harmful sexual behaviour, child-on-child sexual harassment and violence)	On Induction and then every 2 years

Maintain knowledge and development relating to the role of DSL; including keeping up to date with local arrangements	As required, but at least annually

Trust Central Team (TCT)

Applies To	Activity	Frequency
All TCT staff	Receive information on each Trust school's safeguarding arrangements and procedures. This must include a list of each school's DSLs and clear guidance on what to do if safeguarding concerns arise whilst a member of the team is working at one of our schools.	Induction and annually
All TCT staff	Read Keeping Children Safe in Education (KCSiE): Part 1; Part 5 and Annex A.	Annually
All TCT staff	Complete annual online update training including assessment quiz.	Biannually to alternate with Local Safeguarding Awareness Training (see below)
Executive Team	Read Keeping Children Safe in Education (KCSiE): Entire document	Annually
All TCT staff	Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and CYP-on-CYP abuse) concerns	Induction and then every 2 years
All TCT staff	Complete Prevent Awareness Training appropriate to role	Induction and every 2 years
All TCT staff	Complete Cyber Security Training	Induction and then annually
All TCT staff	Complete Online Safety Training	Induction and then annually
All TCT staff	Receive regular national and local safeguarding updates (including those relating to online safety).	Termly updates will be provided This may be done via email.
Executive Team and HR Manager	Complete Safer Recruitment training and Safer Working Practices training	Induction and every 3 years
Finance Director	Safer Working Practice training	Induction and every 3 years

Staff involved in recruitment of staff (including administration)

Activity (in addition to other relevant training as outlined above)	Frequency
Read Part 3: Keeping Children Safe in Education	Induction into role then annually (in Autumn Term) or when updated.
Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE)	Induction and every 3 years (or when KCSiE Part 3 is updated)

All Directors and Local committee members

Activity	Frequency

Complete Governance Safeguarding Training to equip them with the knowledge to carry out their strategic roles and responsibilities.	Induction and then every 2 years.
Read Keeping Children Safe in Education All directors and local local committee members: Part 1; Part 2 and Annex A. Chairs and Safeguarding Link Directors and Local Local committee members: Entire document	Induction into role then annually (in Autumn Term) or when updated).
Complete Cyber Security Training	Induction and then annually
Complete Online Safety Training	Induction and then annually
Complete Prevent Awareness Training appropriate to role The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk))	Induction and every 2 years.

Appendix B: File Transfer Documentation

PART 1: To be completed by sending / transferring setting, school or college.

NAME OF CHILD:	
DOB:	
NAME OF SCHOOL/SETTING SENDING CP FILE:	
ADDRESS OF SCHOOL / SETTING SENDING CP FILE:	
METHOD OF DELIVERY:	BY HAND SECURE POST ELECTRONICALLY
DATE FILE SENT:	
NAME OF DSL TRANSFERRING FILE:	
NAME OF PERSON TRANFERRING TO:	
SIGNATURE:	

PART 2: To be completed by receiving setting, school or college.

NAME OF SCHOOL / SETTING RECEIVING FILE:	
ADDRESS OF SCHOOL / SETTING RECEIVING FILE:	
DATE RECEIVED:	
NAME OF PERSON RECEIVING FILE:	
DATE CONFIRMATION OF RECEIPT SENT:	
SIGNATURE:	

Receiving School: Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.

Appendix C: CYP-on-CYP Abuse (including harassment and violence) Procedures

Our Trust aims to prevent, identify, and respond to child-on-child abuse (including harassment and violence) at the earliest opportunity by:

- Expecting all staff, directors and local local committee members in our Trust's school to ensure they are adhering to and promoting the commitments made in the **Safeguarding Statement**.
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring staff are alert to what CYP might be at highest risk during and around the school day, including being alert to incidents that may have occurred outside of school, and/or online.
- Ensuring that DSLs and other relevant staff have completed training in how to assess and respond to child-on-child abuse. **For further detail; please refer to Professional Development and Support.**
- Being clear how CYP are expected to behave towards one another. Our Trust's Relational Behaviour for Belonging Policy outlines these expectations; how our schools will support CYP to understand and fulfil them; and how they will prevent and respond to behaviour which falls below expected standards. Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring Teaching CYP how to keep safe is implemented.
- Making sure that CYP who experience or are at risk of experiencing abuse from other CYP are identified, feel supported and safeguarded from further harm.
- Making sure that CYP who have caused or are identified as being at risk of being abusive in their behaviour towards other CYP are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that CYP who are more vulnerable to child-on-child abuse are not disproportionately impacted by child-on-child abuse in our schools.

What is Child-on-Child abuse?

Child-on-Child abuse:

- Is when a CYP or group of CYP inflicts harm or fails to act to prevent harm to another CYP.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a CYP can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; child-on-child abuse can take place in spaces and at times of the school day where CYP are less likely to be supervised. Where child-on-child abuse is taking place outside of school (including online) this abuse can also continue and have an impact on a CYP when they are at school.
- Can be defined in different ways (examples are outlined in Keeping children safe in education Part 1; Child-on-Child abuse and Part 5).
- A CYP may experience one or multiple types of child-on-child abuse at the same time.

Serious violence including: physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon

Serious violence is a continuing safeguarding concern. It may involve:

- physical assault,
- carrying, threatening with, or using weapons,
- threats to cause serious harm or kill

Serious violence can often take place in the context of child-on-child conflict or bullying, and it can also be associated with criminal exploitation.
Staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report where a CYP's behaviour towards other CYP causes safeguarding concern; including being alert to behaviour that causes concern outside of school (including online). This includes any concerns about a CYP carrying or using a weapon (or expressing intent to do so) towards another CYP.
The Designated Safeguarding Lead will follow Our response to child-on-child abuse (including harassment and violence) including carrying out a Risk and needs assessment.

Harmful sexual behaviour, sexual harassment and sexual violence

We follow Keeping Children Safe in Education Part 5: child-on-child sexual harassment and sexual violence to recognise and respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. As outlined in Professional development and support, everyone who works for schools is expected to read and follow Part 5. Designated Safeguarding Leads will carry out Brook Traffic Light Training to help them to respond to child-on-child abuse (including harassment and violence).

In ensuring that staff are not downplaying and can recognise harmful sexual behaviour, sexual harassment and sexual violence, it is important that they understand the applicable laws and are careful about making professional judgments about Sexual development and behaviour in children
This includes understanding what consent is and the age of consent; as well as the age of criminal responsibility (all of which is outlined in Keeping Children Safe in Education Part 5).
We are aware and will adhere to the mandatory duty to report child sexual abuse[14], following the publication of statutory guidance which is expected to come into force this academic year.
Staff should not make decisions about CYP's sexual behaviour on their own. Staff are expected to seek the support, advice and expertise of the Designated Safeguarding Lead at their school on this subject.
Where there are concerns indicating child-on-child harmful sexual behaviour, sexual harassment and/or sexual violence (as outlined in Keeping Children Safe in Education Part 5). Staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report This includes behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Any misogynistic or misandrist behaviours should also be reported.

Consensual and non-consensual making or sharing of nudes and semi nudes

Taking and sharing nude or semi-nude explicit images, including those generated using AI of those aged under 18 is a criminal offence.[15]
Where staff become aware that a CYP:

- has or may have shared a nude or semi-nude images, including those generated using AI either of themselves or another child; or
- has or may have had such images, including those generated using AI of themselves shared by another child or children;

they are expected to follow Sharing nudes and semi-nudes: how to respond to an incident and adhere to Staff Safeguarding Concerns: Recognise, Respond, Report. This expectation applies even if the CYP indicates that they have consented to the images being shared (please also see Harmful sexual behaviour, sexual harassment and sexual violence). Staff should immediately

[14] Further information available at: Mandatory reporting of child sexual abuse in England: update on the Crime and Policing Act | NSPCC Learning

[15] See legislation and guidance at: Safeguarding, sexting and sharing nudes | NSPCC Learning

report their concerns to the Designated Safeguarding Lead if there is any indication of adult involvement (including concerns that an adult may be pretending to be a CYP).
The Designated Safeguarding Lead Response to reports of consensual and non-consensual making or sharing of nude or semi-nude images, including those generated using AI will include reference to:

- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- AI Generated Child Sexual Abuse Material Guides for Professionals | Internet Watch Foundation & National Crime Agency

Children who are more vulnerable to Child-on-Child abuse
Please read this alongside Children Potentially at Greater Risk of Harm section of this policy.

CYP who are perceived to be different to others can be particularly vulnerable to child-on-child abuse. When CYP are abused by other CYP; there is more often than not a misuse of power or privilege by the CYP causing harm. This can have a significant impact on the emotional development and mental wellbeing of the CYP who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

CYP who harm others may have additional or complex needs. Harmful behaviour by CYP can also be a sign or indicator that a CYP has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience[16] in their life. CYP who harm other CYP may have power or privilege over a CYP they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-Child abuse is harmful to all children involved.

- Evidence[17] indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes CYP who:
- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes CYP who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian, Mixed Heritage and/or other minoritized ethnic communities (including travelling communities and CYP for whom English is an additional Language). These CYP are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as CYP who are being harmed and more likely to be over identified as CYP who are a risk of causing harm. This is known as adultification bias[18].
- Are Lesbian Gay, or Bi-Sexual. These CYP are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.

[16] See Understanding trauma and adversity | Resources | YoungMinds for further information.

[17] Evidence sources:

- Keeping children safe in education Part 2: Children potentially at greater risk of harm.
- Prevalence of bullying (anti-bullyingalliance.org.uk).
- Safeguarding d/Deaf and disabled children | NSPCC Learning;
- Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning;
- Safeguarding LGBTQ+ children and young people | NSPCC Learning;
- Spotlight #3: Young people and domestic abuse | Safelives.
- Addressing child-on-CYPabuse: a resource for schools and colleges (farrer.co.uk)

[18] Adultification bias within CYPprotection and safeguarding (justiceinspectorates.gov.uk)

- Are questioning their gender. These CYP are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are female. Girls are generally more vulnerable to experiencing child-on-child abuse and to harmful sexual behaviour and abuse in intimate personal relationships. They can however also abuse (including harass and behaviour violently towards) other CYP.
- Are male. Boys are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Boys are more likely to be involved in serious violence including towards other CYP; particularly if:

- they have already experienced child maltreatment;
- previously been a victim of or perpetrated serious violence;
- are CYP whose behaviour causes concern, and/or attend (or have attended) Alternative Provision.

Older boys are also more vulnerable to displaying harmful sexual behaviour; particularly if they have already experienced trauma and family difficulties

Where a CYP has several differences and would fall into multiple groups above; this further increases their vulnerability.

When is child-on-child behaviour considered abusive?
Our Trust recognises the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse and/or serious violence including physical assault and harm, threats to cause serious harm or kill, or the threat of harm with a weapon.

In considering whether behaviour is abusive; staff should consider:

- **The impact on the child(ren) affected by the behaviour**: Any behaviour that is likely to have an impact on a CYP's physical and emotional health and development should be considered potentially harmful. The greater the impact of the behaviour on the CYP's health and development; the greater level of harm caused to them.

The needs and circumstances of the CYP who is identified as being potentially harmed, including whether they are already identified as CYP potentially at greater risk of harm, should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

Even where CYP do not/are not able to express their wishes and feelings; staff should also pay attention to other potential signs/indicators of abuse (please refer further to Staff Safeguarding Concerns: Recognise, Respond, Report section in this Policy)

CYP raising child-on-child concerns either for themselves or others will be taken seriously and never be given an impression they are creating a problem.

- **The behaviour of the child(ren) who is/are allegedly causing harm**: It is important to consider the behaviour of CYP on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a CYP who is causing harm to other CYP could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).

- Features of abusive behaviour[19] can include:
    - A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
    - A misuse of power over the CYP who is being harmed. (please also see children who are more vulnerable above).
    - Victimisation of the CYP who is being harmed. This could also include circumstances where the CYP causing harm is supported or joined by other CYP.
    - Intrusive behaviour; not considering or enabling the CYP being harmed to freely agree and/or consent to the behaviour.
    - An element of control; coercion and/or force.
    - Physical/sexual violence including threats to cause serious harm or kill, or the threat of harm with a weapon (this does not always have to be present; but where it is so would heighten the level of concern).
    - Evidence that a CYP is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

The Trust's response to child-on-child abuse (including harassment and violence)
In most instances, schools will use the Relational Behaviour for Belonging Policy to manage the conduct of CYP towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns; then staff will also need to raise such concerns to the DSL in line with the Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.

In responding to any concern of child-on-child abuse; schools will take account of:

- Keeping children safe in education: Part 5 (Harmful sexual behaviour, sexual harassment and sexual violence), Part 1 and Annex A & B (Serious violence).
- Restrictive interventions, including use of reasonable force, in schools
- Searching, screening and confiscation at school
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- When to call the police: guidance for schools and colleges.
- Local hate relating incident reporting processes (when applicable)
- Brook Traffic Light Tool (when applicable)
- The local Framework for Action including relevant local tools, pathways and support

Risk and needs assessment.
All staff will immediately consider how best to support and protect all CYP involved in child-on-child abuse incidents; ensuring they act in their best interests.

The school may deem it necessary to complete a formally recorded risk and needs assessment for all CYP involved in child-on-child abuse incidents. The decision to complete a formal risk assessment will be taken by the DSL. This formal assessment will always take place where there is evidence of violent or abusive behaviour.

The purpose of the risk and needs assessment is to safeguard all CYP involved (including CYP who may not be at the school, such as siblings) and will clearly outline the strategies to be put in place to mitigate risk and address any identified needs. It's aim will be to safeguard:

[19] Adapted from Hackett Continuum as described in Understanding sexualised behaviour in children | NSPCC Learning. When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see Farrer and Co (2022) page 35-36)

- **All children involved including:**
    - The safety and support needs of/risks to CYP directly affected by the behaviour
    - The safety and support needs of/risks to and from CYP who is/are allegedly causing harm
    - CYP attending the school who have been indirectly affected by or involved in the behaviour or may be at risk of further behaviour
    - other CYP who may not be at the school who may have been affected by or involved in the behaviour or may be at risk of further behaviour (for example siblings or CYP who attend other education provisions)
- **Any adults who may be at risk.** This might include staff or parents/carers who may be at risk of CYP to parent/carer abuse from the child who is causing harm. (please refer to local Multi-Agency Policy: Child to Parent Abuse (CPA))
- **The School,** including considering the wider school community and any steps that may be needed to improve the safety of the school. For example, considering the location and time where harm has allegedly taken place, and considering what steps need to be taken to improve safety.

The risk and needs assessment will be completed using relevant evidence-based assessment tools as applicable; taking account of information from all key staff (and relevant involved professionals) working with the CYP, as well as their parents/carers. It will also include the views and feelings of the CYP; where this is safe and appropriate to do so.

The risk assessment will be shared will all staff and relevant involved professionals who work with the CYP; as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

In circumstances where CYP are displaying sexual behaviour towards other CYP that raises concern; the DSL is trained in and will use the Brook Traffic Light Tool to inform the risk and needs assessment.

Schools' template risk and needs assessment can be found within their personalised policies on their websites.

Response
The parents/carers of **CYP who attend the school and are directly involved** will be notified of and involved in the school's response. The school will only share the details of other CYP to parents/carers who do not have parental responsibility for them where the school has consent to do so or where a decision has been taken to share to enable them to effectively safeguard their CYP(please also refer to Record Keeping and Information Security section of this policy). If we identify other CYP at risk/in need who do not attend the Trust school, we will work in partnership as part of the response.

The risk and needs assessment will inform the response taken. The following responses will be considered; (more than one response can be considered):

- Manage internally/provide every day advice and support in alignment with the Trust Relational Behaviour for Belonging Policy and pastoral support offer in a way which addresses the needs/risks identified. Any consequences imposed on the CYP causing harm will be proportionately balanced with any other responses (such as police involvement) and take accounts of risks and needs; as well as the ongoing impact on/risk to the CYP who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt the curriculum to ensure we are Teaching Children How to Keep safe and areas from Working in Partnership section of this policy.

- **Offer Extra Help/Community Based Early Help** in line with local Framework for Action and/or use of/referral to local education inclusion arrangements; we will consider offering other support or intervention beyond internal management. This could include offering and/or referring **any CYP involved (directly or indirectly) who attends the school** to enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of CYP's wishes and feelings.
- **Offer and refer to Family Help:** in line with the local Framework for Action and/or use of/referral to local education inclusion arrangements. Where is identified that **any CYP involved (directly or indirectly)** who attends the school would benefit from a co-ordinated, multi-agency response and there are clear needs/risks schools will offer and refer to Family Help. Any referrals for support will require parental consent and will take account of CYP's wishes and feelings.
- **Raise Child Protection Concerns** in line with local Framework for Action and (if applicable) Part 5 Keeping children safe in education.
- **Report to the Police.** We will take account of When to call the police: guidance for schools and colleges and (if applicable) Part 5 Keeping children safe in education and/or Sharing nudes and semi-nudes: advice for education settings working with children and young people
- **Report Hate-related behaviour to the Local Authority.** We will follow hate relating incident reporting processes where any child-on-child behaviour is perceived by the reporting person or any other person that the incident was motivated by hostility or prejudice (or perceived hostility or prejudice) based on another person's:
    - Sex
    - Race
    - Religion
    - Sexual orientation
    - Disability
    - Transgender identity

  In these circumstances schools may also request the support of the Victim Support IamMe! programme to prevent and respond to hate-related behaviour.

Recording and monitoring

All child-on- child abuse concerns and responses will be recorded and stored on the CYP protection files of all involved CYP (Please refer to Record Keeping and Information Security section in this policy). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Trust Relational Behaviour for Belonging Policy on CPOMS/Arbor.

Appendix D: School Specific Safeguarding Procedures SCHOOLSTO PERSONALISE

At ********** School, we follow the Trust Safeguarding policy to ensure we embed a culture of safeguarding at the heart of our practice. We want all children and young people to come to school with the ability to thrive and achieve a sense of belonging within school and their wider community. Below outlines school-specific procedures to support this.

Working Ways:

Detail here how you work with all stakeholders to ensure the safety of your pupils. Outline your methods of contact as well as how all groups can raise concerns and how your provide information updates to both pupils and parents.

Detail how your DSL meets with other key SLT (attendance, behaviour lead, sendco) to ensure dots are joined (this has been detailed in the main policy as using the belonging framework as a base, but outline how these meetings look in your school).

Children potentially at greater risk of harm

Describe how your school works with other agencies/facilitates meetings etc.

Name your members of staff that support vulnerable groups such as:

SENDCO

Designated Teacher

LAC coordinator

*Early Help coordinator (if you don't have a set person, list the DSL as there **must** be a person responsible for the monitoring of school-based Early Help)*

Mental Health Lead (add in details of where your mental health action plan can be found)

Teaching our children how to keep safe

Detail how you use your safeguarding data to inform your curriculum whilst adhering to the statutory requirements.

Outline what this looks like in terms of reviewing data for emerging patterns/trends to adapt your curriculum and plan. Please ensure that you reference online safety within this.

Key safeguarding roles and local contacts

Name your DSL and deputy DSLs and your safeguarding link governor or Trustee. Set out your local referral routes and key contacts (the local authority 'front door' or MARF, the LADO, your Prevent/Channel contact and your Operation Encompass key adult), and state where your Single Central Record is held and who maintains it.

Our site and premises

Set out the safeguarding arrangements specific to your building and grounds. Include how you provide and supervise single-sex toilet and changing facilities (and single-sex overnight accommodation on residential visits) to protect pupils' privacy, dignity and safety, in line with the Trust policy, Keeping Children Safe in Education and the School Premises (England) Regulations 2012, together with any alternative individual or lockable facilities you provide. Also cover intimate and personal care and individual care plans; site security and visitor and contractor management (signing in, identification, escorting and supervision); supervision of pupils before and after school, at breaks and during transitions; and the use of any private or one-to-one spaces (for example medical, nurture, counselling or therapy rooms). In any early years provision, also cover key person arrangements, nappy changing and toileting, and safer sleep.

Physical intervention and restrictive interventions

Name the staff trained in the use of reasonable force and other restrictive interventions, and state where incidents are recorded and how and when parents are informed, in line with the Trust policy and the DfE restrictive interventions guidance.

Off-site visits, residentials and alternative provision

Outline your arrangements for off-site and residential visits (including any overnight stays or homestays), and any alternative provision your pupils attend, including how you quality-assure it and monitor attendance and safeguarding.

Devices, images, and filtering and monitoring

Name your senior leader responsible for filtering and monitoring (supported by the DSL and IT) and how this is reviewed locally, and set out your arrangements for mobile phones, staff personal devices, and consent for taking and using images of pupils.

Our local safeguarding context

Briefly describe the contextual and community risks most relevant to your pupils (for example local exploitation, serious violence or online risks) and how your pastoral response and curriculum reflect these. You could also add your contextual safeguarding one-pager if you wanted.

Missing Child Procedures:

Actions to be followed by staff if a child goes missing from the school

Actions to be followed by staff if a child goes missing on an outing

Appendix E: The Belonging Framework