

Safeguarding and Child Protection Policy and Procedures

DOCUMENT CONTROL

Policy owner	Executive Director of Education (Inclusions incl. MAT Lead for		
	Safeguarding & SEND) across MAT & Designated Safeguarding Leads		
Last updated	Autumn 2025		
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Status	APPROVED		
Summary of last revision	Autumn 2025 Updated in line with KCSiE 2025. Expanded guidance under Online Safety and Artificial Intelligence to address risks from harmful content (e.g., pornography, fake news, extremism, self-harm, conspiracy theories), harmful online interactions (peer pressure, grooming), online conduct (explicit images, bullying), online commerce risks (gambling, scams, phishing). Added new protocols for managing incidents involving Al-generated or digitally altered sexual or abusive imagery and deepfake content. Trust approach to Al clarified: Only Trust-approved Al tools may be used; no identifiable information about CYP, staff, or families may be entered into any Al system. Al must never replace professional or safeguarding judgement. Amended sections regarding mental health and wellbeing with explicit inclusion of Designated Mental Health Leads in all Trust schools and clarified staff responsibilities in identifying and responding to mental health concerns as safeguarding issues. Expanded definitions and procedures for child-on-child abuse, including sexual violence, harassment, and sharing of nude/semi-nude images (including Algenerated content). Introduction of risk and needs assessment templates for incidents of child-on-child abuse. Clearer guidance on reporting, recording, and supporting all parties involved. Added Alternative Provision Quality Assurance and new requirements for annual documentation checks, site visits, and safeguarding checks for all staff at alternative provision sites. Enhanced protocols for monitoring attendance, wellbeing, and progress of CYP in alternative provision. Updated training requirements under Professional Development and Training. Clearer guidance on information sharing and reinforced procedures for managing and transferring safeguarding information, including use of CPOMS and secure file transfer protocols. Further guidance on the incorporation of staff and stakeholder feedback.		

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Related Policies	MAT Policies:				
	 MAT Attendance Policy 				
	 MAT Artificial Intelligence (AI) Policy 				
	 MAT Behaviour Policy & Procedures (incorporating tackling) 				
	bullying, inclusion, personal development, support, exclusion				
	and use of reasonable force & physical intervention)				
	MAT GDPR Policy				
	MAT Health and Safety Policy				
	MAT ICT Policy				
	MAT Intimate Care Policy				
	MAT Relationship, Sex and Health Education Policy				
	MAT Recruitment & Selection Policy				
	MAT Social Media Policy				
	MAT Special Educational Needs and Disabilities Policy				
	MAT Staff Code of Conduct Policy				
	MAT Supporting Children and Young People with Medical				
	Conditions Policy				
	MAT Educational Visits				
	MAT Children who are currently or Previously Looked After				
	(P/CLA)				
	MAT Whistleblowing Policy				
	MAT Lettings Policy				
	Other guidance:				
	Statutory Framework for the Early Years Foundation Stage				
	(2023) Section 3 - The Safeguarding and Welfare Requirements				
	Keeping Children Safe in Education 2025				
	Working Together to Safeguard Children 2023				
	Shropshire Safeguarding Community Partnership (SSCP)				
	Procedure Guidance				
	What to do if you are worried a child is being abused 2015 -				
	Advice for practitioners				
	Information sharing: Advice for practitioners providing				
	safeguarding services to children, young people, parents and				
	carers 2018 (currently being revised)				
	Care and support statutory guidance issued under the Care Act				
	2014				
Policy control survey	Please complete this survey and provide feedback if you have had to				
	use this policy				
	https://forms.office.com/r/HMeZtB29Si				

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1 Safeguarding Statement

- 1.1 Trustees, Governors and staff across Marches Academy Trust (the Trust) fully recognise their contribution to safeguarding children & young people (also used for child and young person: CYP). We believe that:
 - all children and young people have the right to protection from all types of abuse, including neglect exploitation, and/or harm.
 - ii. everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.
- 1.2 This means that we will:
- 1.3 practice a culture of professional curiosity, professional vigilance, non-assumptive, non-biased practice, and openness.
- 1.4 not tolerate the abuse, neglect, exploitation and/or harm of CYP. This includes never accepting and always challenging or raising concerns about words or actions which downplay, justify, or promote abuse, neglect, exploitation, and/or harm, or precursory actions. This applies to anyone who is part of, comes into or works with all schools in our Trust.
- 1.5 be CYP-centred 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.
 - i. ensure we provide a safe environment for CYP to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.
 - ii. 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.
 - iii. ensure no CYP or group of CYP are treated less favourably than others.
 - iv. be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of CYP who we know are more vulnerable to experiencing abuse or discrimination.
- 1.6 work in partnership with our CYP, adults responsible for their care (referred to throughout as **responsible adults**, taken to mean those with parental responsibility¹ for the child or young person and may include parents, carers, kinship carers, corporate parents, or guardians), and other agencies. 'Families' is not used in place of responsible parents but is seen throughout this policy to denote instances where partnership or support may be required more broadly to support a CYP, beyond that of a responsible adult.
- 1.7 Children & young people includes everyone under the age of 18.

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¹ S3 Children At 1989

The Trust recognises that all CYP, regardless of who they are or where they are from have the right to protection from all types of abuse. No CYP or group of CYP in our Trust will be treated any less favourably than others in being able to access their right to education or other services and support. This may mean that additional positive actions and/or safeguards may be taken by us to ensure the individual and/or groups of CYP are not disadvantaged from receiving education or services or disproportionately subjected to abuse.

1.8 Vulnerable adults aged 18 and over.

- 1.8.1 As a Trust, we offer post-16 education at some sites and as a result, there may be points in the academic year where adults are accessing education who are age 18 or older. Resultantly, this document applies to both children and young people under the age of 18, and vulnerable adults aged 18 and over. For the definition of safeguarding vulnerable adults, see 3.2.
- 1.8.2 Not all adults who attend education are vulnerable and as such, where an adult within education over the age of 18 divulges information or staff become concerned that they are at risk of harm, this policy is to be followed. The adult's wishes will be taken into account but will not determine the final decision to make a referral.
- 1.8.3 Where action is decided upon which necessitates contacting Adult Services, procedures will be followed as outlined within this policy, substituting 'Children's Services' for 'Adult Social Care Services.'
- 1.8.4 The adult has a right to make their own decisions if they are competent to do so in line with the Mental Capacity Act 2015. If their competency is in doubt, further advice will be sought from the Safeguarding Team to the relevant local authority Adult Social Scare department.
- 1.8.5 Due to the age of an adult, there is no duty to report to the responsible adult (i.e., parent).

2 Legislation, Standards and Guidance

- 2.1 This policy will have consideration for, and be compliant with, the following legislation, statutory guidance, and key information:
 - i. The Rehabilitation of Offenders Act 1974
 - ii. The Children Act 1989 and 2004 amendment
 - iii. Section 3 (5) of the <u>Children Act 1989</u> states that the law empowers anyone who has care of a child to do all that is reasonable in the circumstances to safeguard his/her welfare.
 - iv. Human Rights Act, 1998
 - v. <u>Schedule 4 of the Safeguarding Vulnerable Groups Act 2006</u>, which defines what 'regulated activity' is in relation to children
 - vi. The National Carers Strategy 2008
 - vii. The Care Act 2014
 - viii. The Children and Families Act 2014
 - ix. Counterterrorism and Security Act 2015 -
 - v. Statutory guidance on the <u>Prevent duty</u>, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
 - x. Female Genital Mutilation Act 2003 Serious Crime Act 2015
 - xi. The <u>Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge)</u> (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and <u>Childcare Act 2006</u>, which set out who is disqualified from working with children
 - xii. Education and Training (Welfare of Children) Act 2021
 - xiii. <u>DfE Advice and Guidance to Schools and Local Authorities on Managing Behaviour and</u>
 Attendance 2022
 - xiv. School Suspensions and Permanent Exclusions 2023
 - xv. Working Together to Safeguard Children 2023
 - xvi. Keeping Children Safe in Education 2025 also referred to as KCSiE within this document
 - xvii. The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve CYP outcomes. Some CYP may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
 - xviii. The Ofsted Compulsory Childcare Register
 - xix. UN Convention on the Rights of the Child Articles 28 and 29
 - xx. EYFS statutory framework for group and school-based providers

2.2 Local Procedures:

- i. <u>Shropshire Safeguarding Community Partnership Allegations about staff/volunteers</u> protocol (LADO)
- ii. Shropshire Safeguarding Partnership Threshold Guidance
- iii. West Midlands Safeguarding Procedures

- 2.3 This policy and procedure will also link to other setting/school policies & procedures:
 - i. MAT Attendance Policy
 - ii. MAT Artificial Intelligence (AI) Policy
 - iii. MAT Behaviour Policy & Procedures (incorporating tackling bullying, inclusion, personal development, support, exclusions and use of reasonable force & physical intervention); for the purposes of this document and brevity, this will be referred to hereon in as MAT Behaviour [...] Policy
 - iv. MAT GDPR Policy
 - v. MAT Health and Safety Policy
 - vi. MAT ICT (Information and Communication Technology) Policy
 - vii. MAT Intimate Care Policy
 - viii. MAT Relationship, Sex and Health Education (R(S)HE) Policy
 - ix. MAT Recruitment & Selection Policy
 - x. MAT Social Media Policy
 - xi. MAT Special Educational Needs and Disabilities (SEND) Policy
 - xii. MAT Staff Code of Conduct Policy
 - xiii. MAT Supporting Children and Young People with Medical Conditions Policy
 - xiv. MAT Educational Visits
 - xv. MAT Children who are Previously and currently Looked After (P/CLA)
 - xvi. MAT Whistleblowing Policy
 - xvii. MAT Lettings Policy

3 Definitions

- 3.1 Safeguarding and promoting the welfare of children is defined as:
 - i. providing help and support to meet the needs of children as soon as problems emerge
 - ii. protecting children from maltreatment, whether that is within or outside the home, including online
 - iii. preventing impairment of children's mental and physical health or development
 - iv. ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - v. promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
 - vi. taking action to enable all children to have the best outcomes.
- 3.2 Safeguarding vulnerable adults (see 1.8) is defined in the Care and Support Statutory Guidance issued under the Care Act 2014 as:
 - i. protecting the rights of adults to live in safety, free from abuse and neglect
 - ii. people and organisations working together to prevent and stop both the risks and experiences of abuse and neglect
 - iii. people and organisations making sure that adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
 - iv. recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.
- 3.3 **Child protection** is part of this definition and refers to activities undertaken to prevent CYP suffering, or being likely to suffer, significant harm.
- 3.4 **Abuse** is a form of maltreatment of a CYP and may involve inflicting harm or failing to act to prevent harm. Keeping Children Safe in Education 2025: Part 1 and Annex B explains the different types of abuse and signs and indicators.
- 3.5 **Neglect** is a form of abuse and is the persistent failure to meet a CYP's basic physical and/or psychological needs, likely to result in the serious impairment of the CYP's health or development. .Keeping Children Safe in Education 2025: Part 1 and Annex B defines neglect in more detail.

- 3.6 The following three **safeguarding partners** are identified in <u>Keeping Children Safe in Education</u> (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local CYP, including identifying and responding to their needs:
 - i. The Local Authority (LA)
 - ii. An integrated care board for an area within the LA
 - iii. The chief officer of police for a police area in the LA area
- 3.7 **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the CYP involved feels most comfortable with.
- 3.8 Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of CYP) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

4 Professional Development and Support

- 4.1 When staff join the Trust, they will be informed of the safeguarding CYP arrangements in place and the information and photographs of the Designated Safeguarding Lead (hereafter referred to as DSL) and Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSLs; collectively both DSL and DDSL will be referenced as D/DSL).
- 4.2 All staff and volunteers will complete an induction programme which includes basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a CYP, and how to record a concern about the welfare of a CYP.
- 4.3 To ensure all our staff (including volunteers) and governors are knowledgeable and confident in keeping children safe in our schools, they will complete the professional development activities as outlined below. We monitor professional development activities and maintain central professional development records in our schools.
- 4.4 The D/DSLs provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, development, and performance processes in school. The D/DSL receive regular support and formal supervision in each school, both internally and externally (the latter for identified key staff).

4.5 All Staff (including volunteers)

Activity	Frequency		
Receive information on school safeguarding	Induction then annually, and		
arrangements and procedures as outlined in KCSiE	when arrangements/procedures		
(Part 1: pages 8 - 10, paragraphs 11 -17)	are updated		
Read KCSiE:	Induction then annually (in		
All Staff: Part 1 and Annex B.	Autumn Term) or when updated		
 Senior Leadership Team: Entire document 			
Staff who do not work directly with children:			
Annex A			
Staff who work in Early Years: read all of EYFS			
statutory framework			
Complete Safeguarding Awareness Training (specific	Induction and then every 3 years		
to local area, i.e., SSCP's Raising Awareness,			
delivered by trained trainers) to enable staff to			
recognise, respond to and report safeguarding			
(including online safety and child-on-child abuse)			
concerns including FGM			
Complete Prevent Awareness Training appropriate to	Induction and every 2 years with		
role (Prevent Duty Training)	updates in the interim		
All Staff: Course 1			
 Middle, Senior Leaders & Pastoral: Course 1 & 2 			
■ Safeguarding Staff: Courses 1, 2 & 3			
Complete Cyber Security Training (provided by MAT	Induction and then as directed		
ICT) Cyber security training for school staff -			
NCSC.GOV.UK			

Receive regular national and local safeguarding	Through Trust Update and via
updates including digital safeguarding, online	D/DSLs within school-based
filtering and monitoring, and safe/ethical use of Al	briefings, staff training,
<u> </u>	bulletins, on a weekly basis

4.6 Designated Safeguarding Lead & Deputy Designated Safeguarding Lead(s) - D/DSL

Activity (in addition to all staff above)	Frequency		
Complete Schools Designated Safeguarding Lead	On induction into role and then		
Training to a standard as outlined in KCSiE: Annex C	every 2 years		
Read KCSiE in its entirety.	Induction into role then		
	annually (in Summer Term) or		
	when updated		
Maintain knowledge and development relating to the	As required, but at least		
role of DSL (including, but not limited to regular Early	annually. All Safeguarding Staff		
Help training and Brook Traffic Light Tool training)	must be able to access and use		
	Early Help tools as set out by		
	the Local Authority.		

4.7 All Governors

Activity	Frequency		
Complete Governor Safeguarding Training to equip	Induction and then every 3		
them with the knowledge to carry out their strategic	years		
Roles and Responsibilities.			
Read KCSiE	Induction into role then		
 All Governors: Part 1; Part 2 and Annex B. 	annually (in Autumn Term or		
 Chair & Safeguarding Link Governors: Entire 	when updated)		
document			
Complete Cyber Security Training (provided by MAT	Induction and then annually		
ICT) Cyber security training for school staff -			
NCSC.GOV.UK			
Complete Prevent Awareness Training appropriate to	Induction and every 2 years		
role Prevent Duty Training)			
 All Governors: Course 1 			
 Chair & Safeguarding Link Governors: Courses 1 			
& 2			

4.8 Staff/Governors involved in recruitment of staff (including administration)

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

4.9 All staff will wear appropriate name badges within school and all visitors will sign into school for each visit. Staff with completed DBS (Disclosure and Barring Service) checks will wear grey lanyards whereas visitors, i.e., Supply Staff will wear a black lanyard that

- differentiates them from employed staff but confirms their completed DBS; staff without a completed DBS check will wear red lanyards and will be accompanied onsite at all times.
- 4.10 All staff will be given access to copies of relevant policies and training to help them understand the systems and processes within Trust schools which support safeguarding and the procedures they must follow if they suspect abuse, neglect, exploitation, and/or harm. Relevant procedures include:
 - i. MAT Attendance Policy and Procedures with school-specific appendices
 - ii. MAT Safeguarding and Child Protection Policy and Procedures with school-specific appendices
 - iii. MAT Behaviour Policy & Procedures (incorporating tackling bullying, inclusion, personal development, support, exclusions and use of reasonable force & physical intervention) with school-specific appendices
 - iv. MAT Staff Code of Conduct
 - v. LA Procedures for Managing Children Missing Education
- 4.11 This policy is available via each Trust school's website, and this policy and practice complements other policies concerned with CYP's wellbeing in the Trust.

5 Roles and Responsibilities

We follow 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:

5.1 The Trust's Board of Trustees and Local Governing Bodies (LGB)

- 5.1.1 Have a strategic leadership responsibility for ensuring we take a whole Trust/school approach to safeguarding arrangements as outlined in this policy and that we comply with our duties under <u>Legislation</u>, <u>Standards and Guidance</u>. Part 2 of Keeping Children Safe in Education outlines their key responsibilities.
- 5.1.2 The Safeguarding Governor/Trustee is responsible for leading on the governance oversight of safeguarding arrangements; regularly meeting with the Designated Safeguarding Lead (at least termly) and reporting back to the Local Governing Body via LGB Meetings.
- 5.1.3 The Chair of the Governing Body will liaise with the Local Authority in the event of an allegation of abuse made against the Headteacher in line with Ensuring SafeStaff.

5.1.4 All Governors/Trustees will ensure:

- i. the school has a DSL who has the appropriate status and authority to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- ii. the Trust, and all its schools, have safeguarding and linked policies, and individualised procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with our duties <u>under Legislation</u>, Standards and Guidance at all times.
- iii. all staff and governors are knowledgeable and confident in carrying out their safeguarding duties in line with <u>Professional Development and Support</u>, not limited to only the Safeguarding Link Governor and Chair of Governors.
- iv. that the effectiveness and implementation of safeguarding arrangements are robustly overseen by the school's DSL, and quality assured by the Trust's Designated Safeguarding Lead as outlined in the <u>Safeguarding Assurance Document.</u>

5.2 The Headteacher

Is responsible (with the support of the DSL) for ensuring safeguarding arrangements are implemented effectively in school. This includes:

5.2.1 having the overarching responsibility of ensuring the effectiveness of school safeguarding arrangements as outlined in this policy and individualised procedures.

- 5.2.2 being accountable and reporting to the Governing Body (with the support of the DSL) on the effectiveness of school safeguarding arrangements. This includes reviewing qualitative information and quantitative data to identify areas for improvement and outlining effective solutions; this should include the close working of the D/DSL with those responsible for Relationship, Sex, and Education (RSE), and Personal, Social, Health and Economic (PSHE) Education to develop proactive responses to areas for development.
- 5.2.3 supporting and promoting a whole school safeguarding culture and ethos as outlined in our <u>safeguarding statement</u> and the Trust's Learning for Life Framework. This includes ensuring that the Senior Leadership Team work effectively together and with the DSL, to ensure a whole school approach to safeguarding.
- 5.2.4 take the lead role in ensuring staff are knowledgeable and confident in their safeguarding practice; including ensuring 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.
- 5.2.5 ensuring that school policies relating to site safety and health and safety are in place, implemented and followed by all staff.
- 5.2.6 where the school educates those in Early Years, ensure the requirements set out regarding safer eating and paediatric first aid in the EYFS statutory framework are implemented and followed.
- 5.2.7 enabling the D/DSLs carry out their roles effectively. This means ensuring sufficient resources and time are allocated to enable the D/DSLs and other identified staff, to discharge their responsibilities, including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of CYP, to be appropriately trained, and afforded appropriate supervision.
- 5.2.8 all staff and volunteers practice a culture of professional curiosity, professional vigilance, non-assumptive, non-biased practice, and openness, and therefore feel able to raise their concerns about poor and unsafe practice with regard to CYP, and that such concerns are addressed in a timely manner, in accordance with agreed policies. This includes training staff on how to raise low-level and significant concerns about the conduct or professionalism of colleagues, and a clear system for logging and reviewing concerns raised overtime.
- 5.2.9 ensuring that all school policies including safeguarding policies and procedures, and others required to be in place, are implemented and followed by all staff.
- 5.2.10 a list of all staff and volunteers, and their safeguarding training dates, is maintained and reviewed regularly.

5.3 The Designated Safeguarding Lead (DSL)

Takes the lead responsibility for safeguarding and child protection in our schools. Annex C of Keeping Children Safe in Education 2025 outlines their key responsibilities. All DDSLs support the DSL in the discharge of their responsibilities. Responsibilities include:

- 5.3.1 ensuring that the school has school-specific individualised procedures in place to complement this policy, and that both are implemented and followed by all staff. These must be shared with staff and made available in school-specific appendices.
- 5.3.2 being available to deal with safeguarding and child protection during school hours, and ensuring there is an 'out of hours' plan in place which is outlined on the school website.
- 5.3.3 acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and outside of school.
- 5.3.4 supporting the Headteacher to ensure safe practice in school.
- 5.3.5 managing safeguarding referrals to the LA, Police and any other statutory authorities or multi-agency risk management arrangements.
- 5.3.6 working closely with the LGB, Headteacher and relevant Senior Leadership Team members to ensure a whole school safeguarding culture and ethos as outlined in our <u>safeguarding statement</u> and the implementation of effective safeguarding arrangements, as outlined in this policy and individualised procedures.
- 5.3.7 acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership arrangements.
- 5.3.8 ensuring CYP and their responsible adults are encouraged to raise safeguarding concerns, know how to do so, and know how concerns will be responded to, as outlined in the individualised school-specific procedures.
- 5.3.9 act as a source of support, advice, and expertise to all staff including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in school. This specifically includes working with those responsible for Relationship, Sex, and Education (RSE), and Personal, Social, Health and Economic (PSHE) Education to develop proactive responses to areas for development.
- 5.3.10 working closely with the school's EDIB Lead to ensure they are up-to-date on practice with regards to equity, equality, diversity, inclusion and belonging, and can support and lead investigations into alleged hate crimes against the protected characteristics, confidently and impartially. This includes tracking, analysing and reporting instances of alleged hate crime(s) and the subsequent outcomes, including necessary and appropriate learning and adaptations to practice.
- 5.3.11 ensuring the effective management and oversight of safeguarding information as outlined in <u>Record Keeping and Information Security.</u>
- 5.3.12 maintaining and developing professional development and support.
- 5.4 All staff (including students and volunteers):

- 5.4.1 Are expected to work in line with our <u>safeguarding statement</u> and adhere to the policies, processes and systems that support safeguarding as outlined in this policy and procedures. This specifically includes:
 - i. accessing and maintaining <u>professional development and support</u> to ensure they remain knowledgeable and confident in their safeguarding practice.
 - ii. recognise, Respond and Report as per Staff Safeguarding Concerns.
 - iii. engaging in <u>safe practice</u>. This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of CYP as outlined in <u>Ensuring Safe Staff teaching our children how to keep safe</u>.

6 Ensuring Safe Practice

6.1 Safer recruitment

- 6.1.1 We adopt 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 our setting. All staff/governors involved in recruitment complete additional safer recruitment training as outlined in Professional Development and Support. Our recruitment procedures are outlined in MAT Safer Recruitment and are in alignment with Keeping Children Safe in Education 2025: Part 3 and where applicable (primary-phase settings, EYFS statutory framework part 3.
- 6.1.2 As part of our recruitment and selection processes, we ensure that our commitment to safeguarding and promoting the welfare of children 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. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks 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.
- 6.1.3 In accordance with Keeping Children Safe in Education 2025: Part 3, we maintain a record of information we have received to confirm the necessary preappointment safer recruitment checks are completed on staff (including volunteers, supply staff and students); Governors/Trustees; contractors; and visitors who attend our schools in a professional capacity. We complete the checks on staff, volunteers, and Governors/Trustees who we recruit ourselves. For those who are recruited by others, we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with CYP.
- 6.1.4 All schools keep a single central record that, as a minimum, evidences the following:

- i. all staff have been employed in compliance with safer recruitment requirements (Part Three: Safer Recruitment: KCSIE, 2025).
- ii. date of employment.
- iii. identity and address confirmed, with date.
- iv. qualifications checked, with date.
- v. references checked, with date.
- vi. prohibition from teaching check, with date (for teaching staff).
- vii. Section 128 prohibition check, with date.
- viii. barred list check, with date.
 - ix. Enhanced Disclosure and Barring Service (DBS) check, with date.
 - x. right to work in the UK, with date.
 - xi. checks confirmed by, and date.
- 6.1.5 We comply with the Safeguarding and Welfare Requirements in the Statutory Framework for the Early Years Foundation Stage (EYFS) 2025, the Compulsory Childcare Register, and Keeping Children Safe in Education in respect to references and Enhanced Disclosure and Barring Service checks for staff and volunteers to ensure that no disqualified or unsuitable person works with or has access to the CYP.
- 6.1.6 Where we do not have all the necessary information or there are gaps in the information, we have 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 reserve the right to refuse access to the school site to any person who we are not assured is safe to work or engage in regulated activity with CYP.
- 6.1.7 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 school. Please see Professional Development and Support.
- 6.1.8 When any safeguarding concerns of allegations arise relating to a member of staff, Governor/Trustee or other person working on our school premises, staff are expected to act in line with Ensuring Safe Staff and Staff Safeguarding Concerns: Recognise, Respond, Report.

6.2 Contractors

6.2.1 We have several contracts with external providers to work in our school including with CYP. We have stringent processes in place to ensure that all necessary checks are completed and recorded on schools' Single Central Record (as outlined in Ensuring Safe Practice).

6.3 Visitors

- 6.3.1 We have procedures for recording the details and confirming the identity of visitors, including prospective candidates. We ensure that we have control over who comes into the premises so that no unauthorised person has unsupervised access to CYP. All arranged for visitors coming into Trust schools and entering school premises are outlined in the MAT Safer Visiting Policy.
- 6.3.2 All visitors to our school are expected to act in accordance with our <u>Safeguarding Statement</u>. When external speakers or visitors attend our school premises (whether for school or non-school activities), we conduct due diligence checks to ensure that their views and delivery of material continues to ensure our school is a safe place. This continues to ensure we are <u>teaching our children how to keep safe</u>, as well as promoting fundamental British Values and community cohesion (please also see <u>Preventing Radicalisation</u>).
- 6.3.3 All visitors to the school delivering presentations, assemblies, educational content or similar will be expected to follow the arrangements as set out in the MAT Safer Visiting Policy (appendices).

6.4 Work experience (KS4 and KS5 only)

- 6.4.1 We have processes in place to ensure that individuals or companies who provide work experience placements for our CYP have appropriate safeguarding policies and procedures in place. We 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 2025: Part 4: Adults who supervise children on work experience.
- 6.4.2 If a child's work experience placement is in a specified place where regulated activity is carried out (such as an education or childcare setting), we will work with the provider to ensure that the appropriate checks and/or risk assessments are carried out.
- 6.4.3 All schools operating work experience have a specific Careers Policy which outlines the process, preparation and protocols including how CYP are made aware of the behaviour expected, the adults supervising them, and how, and to whom, to raise any concerns.

6.5 Use of school premises for non-school activities

- 6.5.1 When schools have arranged extra-curricular activities out of school hours which are under the direct supervision or management of school staff, this safeguarding policy is to be followed and any concerns should be managed in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response.
- 6.5.2 We will follow our <u>Ensuring Safe Staff</u> procedures if we become aware of any allegations relating to an organisation or individual using our school premises.
- 6.5.3 Where we have sessions or activities which are provided by another person or organisation that is using the school site and not during school time or under direct supervision, we seek assurances that they have the required child safeguarding

- arrangements in place as an individual/organisation as outlined in <u>Keeping children</u> <u>safe during community activities</u> and <u>visitors</u>. This is regardless of whether CYP who are on roll at our school access the activity or not.
- 6.5.4 The arrangements for this 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.

6.6 Alternative provision

- 6.6.1 The cohort of CYP in Alternative Provision often have complex needs, and we are aware of the additional risk of harm that CYP accessing alternative provision may be vulnerable to.
- 6.6.2 Where we place a CYP with an alternative provision provider, we continue to be responsible for their safety and welfare and are satisfied that the provider can meet the needs of the CYP. We do this by:
 - i. recording the CYP on the Wave as per the Learning for Life Framework and tracking all activity on the CYP's Arbor profile.
 - ii. ensuring all documentation including risk assessments, profiles, referrals (including for ECHNA or BeeU), Reduced Timetables, etc., are completed, recorded centrally and reviewed as per specific guidelines.
 - iii. establishing clear communication channels with the alternative provision providers to allow daily attendance logs, and regular updates regarding progress and wellbeing to be shared.
 - iv. monitoring attendance including daily tracking and the utilisation of the appropriate attendance codes as per <u>Working Together to Improve School</u> Attendance, 2024.
 - v. scheduling regular reviews (at least half-termly) with the intention always focussed on a return to a school setting, whether that is the home school, a different school, or a specialist school.
 - vi. evaluating the effectiveness of the Alternative Provision including visits (at least half-termly) and assessments regarding health and safety, safeguarding and achievement, academic and developmental.
 - vii. engaging responsible adults and working with the CYP to ensure the provision meets their needs, and action plans are followed.
 - viii. intervening when Alternative Provision is not meeting a CYP's needs and utilising school-based support to allow it to be successful.
 - ix. maintaining appropriate records.
 - x. delivering training for staff to allow a CYP to successfully return to school after a placement at Alternative Provision.

- xi. collaborating with multi-agencies to allow a period of education at an Alternative Provision to be successful, and the return sustainable.
- 6.6.3 We obtain written confirmation (at least annually, and at any point such checks require updates, i.e., policy/training expiration dates) from the alternative provision provider that appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own staff. See Appendix E: Alternative Provision Quality Assurance Checklist.

7 Ensuring Safe Staff

- 7.1 We promote an open and transparent culture in which all concerns about the behaviour or conduct of any adults working in, at or on behalf of the school are dealt with appropriately.
- 7.2 There are two levels of allegations or concerns:
- 7.3 Allegations that may meet the harm threshold
 - 7.3.1 Circumstances where someone working within the school has or may have:
 - i. behaved in a way that has or may have harmed a child or young person, and/or
 - ii. possibly committed a criminal offence against or related to a child or young person, or
 - iii. behaved towards a child/ren or young person/people in a way that indicates that they would pose a risk of harm to children or young people, or
 - iv. behaved or may have behaved in a way that indicates they may not be suitable to work with children and young people. This includes any behaviour that may have occurred outside of the school that could pose a transferable risk.
 - 7.3.2 Allegations that someone working in, at or on behalf the school has met the harm threshold should be immediately referred to the Headteacher in person. Staff may be required to provide a written statement at the request of the Headteacher.
 - 7.3.3 If the allegation relates to the Headteacher, this should be immediately verbally reported to the Chair of Governors. Staff may be required to provide a written statement at the request of the Chair of Governors.
 - 7.3.4 If there is any conflict of interest or immediate risk of harm to a child or young person, 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.
 - 7.3.5 In most cases, the Headteacher (or the Chair of Governors) will lead on managing allegations with the support of the Human Resources Department, the DSL and the Trust DSL. They will ensure that Part 4 Keeping Children Safe in Education 2025 and Shropshire Safeguarding Community Partnership Managing Allegations

- <u>Procedures</u> are applied. Any allegations that meet the above criteria will be referred to the Local Authority Designated Officer within one working day and we will follow their advice and guidance.
- 7.3.6 It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fairly and consistent way to effectively safeguard all those involved. We also have a duty of care towards our staff, and we will provide a named contact for the staff member.
- 7.3.7 If necessary, we will adhere to our legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Part 3 Keeping Children Safe in Education if the criteria for such reporting is met.
- 7.3.8 **Primary Settings with nurseries only:** we 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.
- 7.4 Allegations / concerns that do not meet the harms threshold (Low level concerns)
 - 7.4.1 The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteers may have acted in a way that:
 - i. is inconsistent with the MAT Staff Code of Conduct Policy, including inappropriate conduct outside of the workplace
 - ii. does not meet the harm threshold as 7.1 above.
 - 7.4.2 Low level concerns should be reported in person to the Headteacher to embed our culture of openness and transparency, and to ensure that our schools' values and expected behaviours are lived, monitored, and reinforced by all staff. If the Headteacher is not available, the DSL should be informed.
 - 7.4.3 The Headteacher will decide the outcome of all low-level concerns (in consultation with the DSL if necessary) raised in line with this policy, and the MAT Staff Code of Conduct Policy. 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.
 - 7.4.4 Where the concern is about the Headteacher, the Executive Link for the school (a member of the Executive Team employed within Marches Academy Trust) or the Trust DSL must be notified directly. The concern will be reviewed as per 7.4.3 and decision made as to the appropriate outcome, including whether to raise this with the Chair of Governors as a safeguarding issue (7.3) or conduct issue as per MAT Code of Conduct Policy. Such concerns will be logged centrally with the Trust Safeguarding team.
 - 7.4.5 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 children. If staff have such concerns, these should be raised

to the Headteacher or refer to the MAT Whistleblowing Policy. If staff feel unable to raise concerns with the school directly, they can contact MSPCC Whistleblowing Advice Line.

8 Record Keeping and Information Security

- 8.1 We have a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We have data protection processes in place to ensure that we keep and process (manage) personal information about CYP, their responsible adults, staff, and others, safely and lawfully. This includes:
 - i. securely manage electronically held information in line with <u>Meeting digital and technology standards in schools and colleges</u> and <u>Early Years practitioners: using cyber security to protect your settings NCSC.GOV.UK</u> (see also <u>Online Safety</u>).
 - ii. manage requests for access to personal information we hold (known as subject access requests).
- 8.2 Details of our processes and how to request access to personal information we hold are outlined in MAT Data Protection Policy (GDPR).
- 8.3 Storage and management of safeguarding information (child protection files)
 - 8.3.1 Any member of staff receiving a disclosure of abuse from a CYP, or noticing signs or symptoms of possible abuse and/or harm, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the CYP's own words (verbatim) as far as possible. All notes should be timed, dated and signed, with the name printed alongside the signature.
 - 8.3.2 The notes then need to be added to CPOMS* (or for *onboarding schools, their safeguarding system, i.e., My Concern hereon after, CPOMS denotes any school's safeguarding system as specified here) and the D/DSL(s) alerted. Where the use of CPOMS is not possible, the documented disclosure will be passed immediately to the DSL, who will place them into an allocated child-file stored within the locked safeguarding cabinet or will use allocated yellow plastic files to indicate Child Protection files that are written. A chronology of safeguarding events and referrals will also be logged (this is automatic in CPOMS* this is a safe and secure system.)
 - 8.3.3 For non-safeguarding matters, notes may be recorded on Arbor or CPOMS, dependent upon each Trust setting and, if further evidence such as statements are taken (see MAT Behaviour [...] Policy and Procedures: Appendix H), they should be placed on the CYP's main file.
 - 8.3.4 When a concern about a CYP's welfare or safety is raised it will be discussed with the DSL and recorded (as above). The DSL will decide if the concern should be shared with another agency or kept on record in case future concerns arise.
 - 8.3.5 Records should include:
 - i. a clear and comprehensive summary of the concern;
 - ii. details of how the concern was followed up and resolved (added action on CPOMS);
 - iii. a note of any action taken, decisions reached and the outcome (added action on CPOMS).

8.3.6 All records will be stored on the secure system of CPOMS but where there are additional files, these will be stored in a separate confidential file in a locked cabinet, in a secure place with restricted access.

8.4 Sharing safeguarding information with others

- 8.4.1 We are proactive in sharing information with each other and others who are working with our CYP and their responsible adults as early as possible, so that CYP can receive the help and support they need.
- 8.4.2 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. Staff are not permitted to share information with friends, family, or anyone in the local community outside of their work.

8.5 Transfer of child protection files and other safeguarding information

- 8.5.1 Where CYP leave the school or college (including in-year transfers) the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. When a CYP transfers to another school/setting within this or another authority, the confidential information held is forwarded under confidential cover and separate from the CYP's main file to the DSL for child protection in the receiving school/setting. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained (Appendix C).
- 8.5.2 If a CYP is absent from education or Electively Home Educated, we share relevant information with the Local Authority as required by law (please also see <u>Supporting CYP Potentially at Greater Risk of Harm</u>). If the CYP leaves our setting and does not move to a new education setting, we transfer their child protection file (and any additional information as necessary) to the relevant Local Authority that they reside in line with the local protocol.
- 8.5.3 In addition to the child protection file the DSL will consider sharing information with the new setting/school/college in advance of a CYP leaving. We use Shropshire Transition in Education Guidance to guide our practice approach.

8.6 Sharing information with other organisations

- 8.6.1 Staff should be familiar with and use <u>Information sharing advice for safeguarding</u> practitioners.
- 8.6.2 As part of our work in partnership with families and CYP, consent to share their information with others outside of school should always be sought from a CYP and their responsible adult(s) unless it is not safe to do so. This includes where seeking consent would delay in making enquiries about significant harm.
- 8.6.3 If a person with parental consent 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. Therefore, staff must make a CYP's responsible adult(s) and CYP aware that information may

- still be shared with other organisations if necessary to help keep CYP safe or promote their welfare or if there is another legal basis to so do.
- 8.6.4 Decisions to share safeguarding information with other organisations will be overseen by the DSL (please also refer to <u>Designated Safeguarding Lead Response</u>). The DSL 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.
- 8.6.5 The Data Protection Act 2018 and UK General Data Protection Regulation do not prevent the sharing of information for the purposes of keeping CYP safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the D/DSL. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of CYP.

8.7 The Wave: reviewing information over time

- 8.7.1 When information is being accumulated prior to possible referral we will start a chronology of events via our online safeguarding system, CPOMS.
- 8.7.2 The DSL will regularly review all child protection chronologies to decide if the accumulation of events is having a detrimental impact on a CYP and must be referred on. If the DSL decides not to refer, the reason will be noted on the CYP's chronology. This review should take place as part of the Wave Review (see MAT Behaviour [...] Policy and Procedures).
- 8.7.3 The Trust adopts a graduated review system to ensure the needs of all CYP are identified, understood and responded to in a timely manner. This system considers the holistic needs of all CYP including (but not limited to) their contextual safeguarding needs, academic attainment and progress, attendance, and vulnerability factors (pupil premium, children previously or currently looked after, supported by a social worker, young carer, etc.) CYP are placed within our tiered 'Wave' system against the Learning for Life framework (see Appendix B). Reviews of the Wave are regularly completed within each school (at least every three weeks) and the MAT DSL alongside MATi colleagues also completes regular compliance checks and vulnerable CYP reviews to ensure that all CYP with safeguarding concerns are supported effectively.

9 Managing Disclosures from Children and Young People (CYP)

- 9.1 Staff and volunteers in schools are in a unique position to observe CYP's behaviour over time, and often develop close and trusting relationships with them. If a CYP discloses directly to a member of staff, they must act immediately and speak to the Designated Safeguarding Lead or Deputy; the following procedures will be followed. There are keywords that, when used, should be triggers for action, regardless of intent. In the case of violent, sexual, racist or prejudiced language, the least that should happen is a record of the incident, a discussion with the CYP, and CYP's responsible adult(s) informed, i.e., rape, rapist, sexual assault or forced sexual activity.
- 9.2 Listen carefully to what is said: Ask no leading questions (i.e., questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, for example, "Did your parent hit you?") The questions will relate to clarification of what has been expressed by the CYP.
- 9.3 **Do not force the CYP to repeat what was said in front of another person:** Following a disclosure, the member of staff should talk immediately to the DSL and complete a written record, making the responsible adult(s) of both parties informed, unless it will place a CYP at further risk of significant harm.
- 9.4 *Recording:* Ensure that the disclosure is recorded using the words said by the person making the disclosure.
- 9.5 All disclosures must be managed as per <u>8.1 Storage and management of safeguarding information (child protection files)</u>.

9.6 Supporting staff and supervision

- 9.6.1 We recognise that staff working in Trust schools, who have supported a CYP who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. All Trust schools will support such staff by providing an opportunity to talk through their anxieties with the DSL, and to seek further support as appropriate.
- 9.6.2 To ensure that all staff are alert to any issues for concern, staff receive regular training and updates in safeguarding and child protection through a range of training and supervision activities. This includes both formal and informal supervision, annual appraisals, staff meetings and access to National College, Early Help and SSCP approved training. Individual supervision offers specialist staff an opportunity to receive coaching to improve their practice with CYP and address any issues resulting in poor performance. Individual supervision also provides a safe space in which to raise any concerns they may have about the conduct of other adults connected with the setting. All Trust schools ensure that D/DSL(s) and Designated Teachers (DTs) for Children Previously or currently Looked After (P/CLA) receive supervision either facilitated within the setting or with an external provider.
- 9.6.3 Staff supervision is also used to ensure that all staff remain suitable to work with CYP. If a member of staff is taking medication which may affect their ability to care for CYP, the staff member should seek medical advice. The setting will ensure

- that staff members only work directly with CYP if medical advice confirms that the medication is unlikely to impair that staff member's ability to look after CYP properly.
- 9.6.4 Staff are also required to disclose any information, which may lead to their disqualification as outlined in EYFS statutory framework 2025 and Keeping Children Safe in Education 2025.

10 Working in Partnership

10.1 As is outlined in our <u>safeguarding statement</u>, and in order to ensure all CYP in our Trust are effectively safeguarded and their welfare is promoted, all Trust schools will work in partnership with our CYP, their families and other agencies/partnerships as follows:

10.2 Children and Young People (CYP)

- 10.2.1 Our CYP are <u>taught how to keep safe</u>, including how and when to share or report to us any worries or concerns they may have about their safety and wellbeing, or that of others. We encourage CYP to share and report worries and concerns. These are outlined in each schools' school-specific protocols (available on each schools' website).
- 10.2.2 Staff are expected to build trusted relationships with, and work in the best interests of CYP in line with our <u>safeguarding statement</u> and recognise, respond and report <u>staff safeguarding concerns</u>.
- 10.2.3 We also actively seek children's views of safety in school through school-specific voice captures (surveys, spotlights, discussions), via our Trust MyVoice (individual CYP survey online) and OurVoice (school-specific CYP group discussions).

10.3 Responsible adults

- 10.3.1 We recognise the importance of working together with and supporting families to safeguard and promote the welfare of their children. Staff, however, must not use personal devices or private email accounts for work-related communication with CYP or families.
- 10.3.2 To permit strong partnership between schools and CYP's responsible adult(s), schools will:
 - i. meet with responsible adults prior to CYP starting a Trust school to request information relating to the CYP's routines, likes and dislikes, special dietary requirements, intolerances/ allergies and allergy action plans and requesting responsible adults inform us of any changes to these throughout the year.
 - ii. communicate to responsible adults how we keep CYP safe in our school (including online) and how they can keep their child(ren) safe at home, including filtering, monitoring and safer use of AI. This policy is made available to all families via individual schools' websites. If responsible adults want to raise concerns or

complaints about how we keep their children safe, they can do this using the Complaints Policy which is available on all Trust schools' websites. We also actively seek views of responsible adults regarding safety in school via family surveys and in discussion at open events, including family evenings.

- iii. encourage responsible adults to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. Staff are expected to respond to anybody who raises worries or concerns to them either about their child(ren) or others in line with Staff Safeguarding Concerns: Recognise, Respond, Report.
- iv. coordinated by the DSL, ensure that we work with responsible adults to offer and enable support for CYP and their families, taking action to safeguard and promote their welfare (see Designated Safeguarding Lead Response) in line with the local arrangements in the area that they live.
- v. ensure that responsible adults are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority and/or Enforcement Agencies.
- vi. provide responsible adults with regular information, guidance and external support available to them via weekly newsletters, signposting (in school-specific protocols), Facebook and emails.

10.4 Other agencies/partnerships

- 10.4.1 As we operate in Shropshire, we engage and co-operate with our local safeguarding arrangements. Our local safeguarding partnership is the Shropshire Safeguarding Community Partnership (SSCP). We engage and co-operate by:
 - i. ensuring we effectively safeguard and promote the welfare of CYP living in Shropshire in line with <u>Working Together to Safeguard Children</u> and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the <u>SSCP Threshold Document</u>. Where CYP do not live in Shropshire but attend our school, we will work in line with the relevant local arrangements in their home area.
 - i. ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding CYP potentially at greater risk of harm.
 - ii. supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
 - **iii.** working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure we are providing high quality education and support to CYP in Shropshire.
 - iv. participating in the local Operation Encompass Protocol, an arrangement where police notify schools when a CYP who attends their school may have been seen, heard or experienced police-attended incidents of domestic abuse. This enables us to provide appropriate emotional or practical support to CYP who may have seen, heard or experienced domestic abuse. All new responsible adults are sent a letter informing them of our participation in Operation Encompass (the letter to

send to CYP's responsible adult(s) can be found at <u>School Operation Encompass</u> - Shropshire Learning Gateway (shropshirelg.net).

10.5 Community Safeguarding

We recognise the importance of working with our community of stakeholders. All schools produce a triennial Community Plan including safeguarding-specific actions. These are published on each schools' website.

11 Teaching Our Children and Young People (CYP) How to Keep Safe

- 11.1 We recognise that educating our CYP in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. We have a clear set of values and standards to provide opportunities for CYP to learn how to keep themselves and others safe that are demonstrated and reinforced throughout school life and underpinned through:
 - i. Safeguarding Statement
 - ii. MAT Behaviour [...] Policy and Procedures
 - iii. Preventing Radicalisation
 - iv. our curriculum underpinning online safety including Al.
 - v. our Personal Social Health and Economic Education and Computing curriculum and policies including our <u>MAT R(S)HE Policy</u>. Our R(S)HE program is developed to be fully inclusive of all ages and stages of development and consideration of CYP's needs including <u>CYP potentially at greater risk of harm</u>; and addresses issues as outlined Keeping Children Safe in Education 2025: Part 2: Opportunities to Teach Safeguarding
 - vi. interpreting the world in which we live including recognising and responding to misinformation.
- 11.2 The DSL, R(S)HE lead and other key members of the Senior Leadership Team (such as Online Safety Lead, Designated Mental Health Lead 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 school.

12 Online Safety

12.1 Risks

- 12.1.1 The use of information and communication technology (ICT) is a vital part of the everyday functioning and life in school. We also recognise the important role ICT plays in the lives of our CYP and their families.
- 12.1.2 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:
 - i. **content:** being exposed to illegal, inappropriate, or harmful content, which may include but is not limited to: pornography, fake news, misogyny, self-harm, suicide, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
 - ii. **contact:** being subjected to harmful online interaction with other users which may include but is not limited to: peer to peer pressure, and adults posing as children or young adults to groom or exploit children.
 - iii. **conduct:** online behaviour that increases the likelihood of, or causes, harm to CYP or others which may include but is not limited to: making, sending, and receiving explicit images, sharing other explicit images and online bullying.
 - iv. **commerce:** illegal, inappropriate, or harmful online commercial activities that can compromise the health and wellbeing or security of children or others which may include but is not limited to: online gambling, inappropriate advertising, phishing, or financial scams.
- 12.1.3 Trust schools adopt whole school approaches to online safety which aims to safeguard and educate CYP and their families, staff, and visitors to schools in the use and management of ICT (including the use of camera-enabled mobile and personal devices, and the ICT systems in place). The Trust's ICT Policy outlines the Trust approach.
- 12.1.4 The Trust promotes the responsible and ethical use of Artificial Intelligence (AI) to support teaching, learning and operations. All must never replace professional or safeguarding judgement. Only Trust-approved AI tools may be used, and no identifiable information about CYP, staff or families may be entered into any AI system. All use of AI will follow the MAT Artificial Intelligence Policy, Data Protection (GDPR) and ICT Acceptable Use Policy. Any AI-related concerns or breaches must be reported immediately to the DSL and ICT Support. CYP will be taught, in age-appropriate ways, how to use AI safely, ethically and under supervision.
- 12.1.5 Where there are online safety concerns involving identified children (including child-on-child abuse), our schools will follow <u>Staff Safeguarding Concerns:</u>
 Recognise, <u>Respond</u>, <u>Report</u> and <u>Designated Safeguarding Lead Safeguarding Response</u>.
- 12.1.6 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 our Data Protection Processes to the <u>Information Commissioners Office</u>. Please also see <u>Record Keeping and Information Security</u>. For more information, those reporting any such breaches must contact the schools' Operations Manager for more information.

- 12.1.7 Where CYP are being asked to learn online at home, our schools follow advice from the Department of Education; <u>Safeguarding and remote education</u>.
- 12.1.8 All Trust schools review their online safety arrangements annually to ensure that they meet the Keeping Children Safe in Education 2025 and <u>Safeguarding children and protecting professionals in early years settings: online safety considerations online safety standards (including the digital standards for <u>filtering and monitoring</u> and <u>cyber security</u>). Any risks arising from reviews are clearly recorded as part of school evaluations and improvement action planning processes.</u>
- 12.1.9 All staff, senior leaders and governors are appropriately trained (see Professional Development and Supervision) to enable them to ensure effective online safety arrangements and the ethical and safe use of AI. All schools will respond to online safety incidents which indicate safeguarding concerns in line with the Staffguarding Concerns: Recognise, Respond, Respond, Respond, <a href="Responsed Res

12.2 Incidents involving nude or semi-nude images

- 12.2.1 Incidents involving nude or semi-nude images, including AI-generated or digitally altered sexual or abusive imagery and deepfake content will be managed as follows:
 - The incident will be referred to the D/DSL immediately and the D/DSL will discuss it with the appropriate staff. If necessary, the D/DSL may also interview the CYP involved.
 - ii. Responsible adults will be informed at an early stage and involved in the process unless there is good reason to believe that involving them would put a CYP at risk of harm.
 - iii. At any point in the process, when there is a concern a CYP has been harmed or is at risk of harm we will refer the matter to the Police and/or Children's Social Care.
- 12.2.2 The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in March 2024 <u>UKCIS advice 2024</u>. The school will have regard to this advice when managing these issues.
- 12.2.3 Senior members of staff, in conjunction with the DSL, may need to view data stored on devices if there is due cause to suspect that these conditions have been broken. CYP found to be responsible for an offence will have their device confiscated; it will be returned to their family or passed to the police. If there is suspicion that a device contains inappropriate images or digital content it will not be interrogated but it will be confiscated, and the device will be passed on to the police for investigation.

12.3 Youth Produced Sexual Imagery

When managing incidents involving Youth Produced Sexual Imagery, including AI-generated or digitally altered sexual or abusive imagery and deepfake content, the following guidance will be followed:

12.3.1 Staff will not:

- i. view any images suspected of being youth produced sexual imagery, unless there is no other possible option, or there is a clear need or reason to do so. If it is deemed necessary, the image will only be viewed by the D/DSL and their justification for viewing the image will be clearly documented on CPOMS.
- ii. send, share, save or make copies of content suspected to be an indecent image of a CYP (i.e., youth produced sexual imagery) and will not allow or request CYP to do so if made aware of an incident involving the creation or distribution of youth produced sexual imagery.

12.3.2 Staff will:

- i. immediately notify the D/DSL of any suspected Youth Produced Sexual Imagery.
- ii. act in accordance with <u>Staff Safeguarding Concerns: Recognise</u>, <u>Respond</u>, <u>Report</u> and <u>Designated Safeguarding Lead Response</u> sections of this policy.
- iii. respond in line with the <u>UKCCIS</u>: <u>'Sexting in schools and colleges</u>: <u>responding to incidents and safeguarding young people</u>' guidance.
- iv. store the device securely.
- v. consider the deletion of images but delete images only when the D/DSL has confirmed that other agencies do not need to be involved and are sure that to do so would not place a CYP at risk or compromise an investigation.

12.3.3 The D/DSL and Online Safety Lead will:

- i. act to block access to all users and isolate any indecent images taken or shared on our network or devices.
- ii. carry out a risk assessment which considers any vulnerability of CYP involved, including carrying out relevant checks with other agencies.
- iii. inform responsible adults, if appropriate, about the incident and how it is being managed.
- iv. make a referral to Children's Services and/or the Police, as deemed appropriate.
- v. provide the necessary safeguards and support for CYP, such as offering counselling or pastoral support.
- vi. implement appropriate sanctions in accordance with the MAT Behaviour [...] Policy and Procedures.

VII.	implemen	ted; the Leades, where nece	ership Team	will also re	view and upd	ate any manag	e was ement
	procedure	s, where hece	ssaiy.				
			20				

13 Preventing Radicalisation

- 13.1 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.
- 13.2 Our Trust schools fulfil their duties by:
 - i. promoting fundamental British Values as part of our values and curriculum.
 - ii. ensuring that we provide a safe space for CYP to understand and discuss sensitive topics, those linked to radicalisation, terrorism and extremism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.
 - iii. being alert to and identifying CYP who may be <u>susceptible to extremist ideology</u> and radicalisation into terrorism, and where it is assessed as appropriate by the <u>Designated Safeguarding Lead</u>, make a Prevent referral (in line with the local <u>Preventing Terrorism Processes</u>).
 - iv. monitoring and reporting any hate based behaviour as part of our MAT Behaviour and Tackling Bullying [...] Policy and Procedures (Hate related incident reporting processes can be found here).
 - v. outlining in our MAT ICT, and MAT Relationship Sex Health Education Policies how CYP are being safeguarded from being drawn into terrorism (including visiting speakers; we ensure that hosting external speakers or visitors that attend our school premises are suitable and appropriately supervised, see also, <u>Visitors</u>). (Please also refer to <u>Teaching Our CYP How to Keep Safe</u>.
 - vi. assessing the risk of our CYP being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in our school evaluation processes and inform our approach to online safety (including filtering and monitoring and cyber security arrangements).
- 13.3 All Trust schools regularly review their adherence to the Prevent Duty. Any actions arising from assessments are included in school evaluation and improvement action planning processes, captured in schools' individual <u>prevent risk assessments</u>. These are reported to and overseen by our Local Governing Bodies and available upon request.
- 13.4 All staff, senior leaders and governors are appropriately trained (see Professional Development and Support) to enable them to ensure that all CYP, particularly those who may be susceptible to extremist ideology and radicalisation are effectively safeguarded. We respond to CYP who are identified as being susceptible to an extremist ideology in line with the Stafeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response sections of this policy.

14 Supporting Children and Young People Potentially at Greater Risk of Harm

- 14.1 We recognise that whilst all CYP should be protected, some groups of CYP, are potentially at risk of greater harm than others, both online and offline, including risks arising from online activity, digital coercion, or AI-generated/altered content. The list below is not exhaustive but highlights some of those groups. Where a CYP falls into multiple groups this potentially further increases their vulnerability.
- 14.2 We give special consideration to CYP who (this list is not exhaustive):
 - i. have special educational needs (SEN) or disabilities or health conditions (see MAT SEND Policy);
 - ii. are young carers;
 - iii. may experience discrimination due to one or multiple <u>protected characteristics</u> (age, disability, gender reassignment, pregnancy and maternity, race, religious belief, sex or sexual orientation; see MAT Equality, Diversity and Belonging for Children and Young People Policy);
 - iv. have English as an additional language;
 - v. are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence (including those with Operation Encompass alerts);
 - vi. are at risk of FGM, sexual exploitation, forced marriage, or radicalization;
 - vii. are asylum seekers;
 - viii. are at risk due to either their own or a family member's mental health needs;
 - ix. are looked after or previously looked after (see MAT Children who are Previously or currently Looked After (P/CLA) Policy);
 - x. are missing from education or persistently or severely absent from education (see MAT Attendance Policy) and/or
 - xi. whose family has expressed an intention to remove them from school to be home educated.

14.3 CYP who need a social worker (Child in Need and Child Protection Plans)

- i. CYP may need a social worker due to safeguarding or welfare needs. CYP may need this help due to abuse and/or neglect and/or exploitation and/or harm and/or complex family circumstances. A CYP's experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.
- ii. In partnership with the Virtual School(s), the D/DSL will also work with the Virtual School to support CYP with a Social Worker, much like that of CYP P/CLA.

14.4 CYP who are young carers

- i. A young carer is someone aged 16 and under who cares for a friend or family member who, due to illness, disability, a mental health problem or an addiction, cannot cope without their support. Older young carers are also known as young adult carers (25 and under), and they may have different support needs to younger carers.
- ii. The level of responsibility assumed by a young carer is often inappropriate to their age and at a level beyond simply helping with jobs at home, which is a normal part of growing up; as such it may impact on the education of the CYP.
- iii. Unless the school is advised about a CYP's home circumstances, a young carer can first be identified by negative aspects of their engagement in school (attendance, punctuality, behaviour, work, etc.) Some young carers worry about appearing different to their peers due to bullying or interference in their family life and may seek support to conceal their role from their peers and from teachers.
- iv. Key indicators that a CYP is a young carer, may include:
 - o regular lateness, or unexplained absence, possibly increasing periodically
 - o tiredness during the school day
 - lack of homework completed or poor quality
 - o lack of concentration, anxiety or worry
 - under-achievement for potential capability
 - behavioural problems
 - o lack of interest in extra-curricular activities, especially after school
 - apparent parental disinterest, delays in response, non-attendance to progress evenings/information evenings
 - poor hygiene/physical appearance and/or
 - being the victim of bullying.

14.5 CYP currently or Previously Looked After (P/CLA)

- 14.5.1 All schools within the Trust have a Designated Teacher (DT) for CYP Previously or currently Looked After (P/CLA). Under this role, for each CYP they:
 - i. know the CYP's looked after legal status (looked after under voluntary arrangements with consent of parents, or an interim, or full care order)
 - ii. hold contact arrangements for birth parents, or those with parental responsibility
 - iii. hold information about the CYP's care arrangements, and the levels of authority delegated to the carer by the authority looking after them

- iv. hold details of the CYP's social worker, and the name of the virtual school head in the authority that looks after the CYP
- v. know that a previously looked after CYP may remain vulnerable, both online and offline, and may require ongoing additional support. All staff will monitor these CYP carefully and refer to the Designated Teacher for Looked After Children (see MAT Looked After and Previously Looked After Children Policy for details).
- 14.5.2 In partnership with the Virtual School(s), DTs for P/CLA will work to support the educational attendance, attainment, and progress of CYP P/CLA.

14.6 CYP absent from or not in receipt of full-time education

- 14.6.1 All CYP aged 5-16 are legally entitled to a full-time education, suitable to any special education 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.
- 14.6.2 CYP being absent from education for prolonged periods and/or on repeat occasions and/or without explanation can act as a vital warning sign to a range of safeguarding issues including abuse, neglect, exploitation and/or harm, as well as other needs. Trust schools' response to persistently absent CYP and CYP who are absent from education supports identifying such abuse, and in the case of absent CYP, helps prevent the risk of them becoming a 'child missing education' in the future.
- 14.6.3 Where reasonably possible all Trust schools will hold at least two emergency contacts for every CYP in their setting in case of emergency and in case there are welfare concerns at home.
- 14.6.4 Trust staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. We refer to and use Statutory Guidance on children missing education to ensure we comply with our duties regarding CYP 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.
- 14.6.5 There are many reasons why we want CYP to have regular attendance at Trust settings: as well as supporting their learning and development, we want to ensure that CYP are kept safe, their wellbeing is promoted, and they do not miss out on their entitlements and opportunities. In a small minority of cases, good attendance practice may also lead to the earlier identification of more serious concerns for a CYP or family and may have a vital part to play in keeping a CYP or other family members safe from harm.
- 14.6.6 In Trust settings, we have procedures for recording and following up any unexplained non-attendance and know how to respond to different problems and where to access advice, support or whom to alert when concerns arise. Please see MAT Attendance Policy and school-specific appendices for more information.

- 14.6.7 We have policies in place; that are in line with associated statutory guidance and Shropshire Council Education Access Service Local Processes including:
 - viii. Attendance Policy (in line with <u>Working together to improve school attendance</u> and <u>Children Missing Education</u> process, when removing a CYP from the school roll at standard and non-standard transition points).
 - ix. CYP with Medical and Health Needs Policy, including how we support CYP who cannot attend school (in line with <u>Education for children with health needs who cannot attend school</u>).

14.7 CYP who are Electively Home Educated (EHE)

- 14.7.1 Many home educated CYP have an overwhelmingly positive learning experience. We would expect the family's decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. When a responsible adult(s) notifies us that they wish to deregister their child to electively home educated them, we will immediately notify the local authority.
- 14.7.2 Where those with parental responsibility express an intention to electively home educate, we coordinate meetings with responsible adults and professionals to ascertain the appropriateness of such a decision, and adhere to <a href="https://document.org/leget/new-base-such ascertain-base-such ascerta

14.8 CYP who have experienced multiple suspensions and are at risk or, or have been permanently excluded

- 14.8.1 It is important that CYP in our Trust know and understand how we expect them to behave, to maintain our schools as places where all CYP feel safe and are able to learn. Serious, harmful and/or repeated behaviour by CYP will always be responded to. Such behaviour 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, and/or harm or some other form of adverse experience in their life.
- 14.8.2 See <u>MAT Behaviour [...] Policy and Procedures</u> for more information regarding expectations, and 14.12 for more information as to how CYP's needs are reviewed and supported.

14.9 CYP with Special Educational Needs and Disabilities (SEND)

- 14.9.1 CYP with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.
- 14.9.2 We recognise that additional barriers can exist when recognising abuse, neglect or exploitation, and/or harm in this group of CYP (i.e., assumptions that indicators

- of possible abuse such as behaviour, mood and injury, relate to the CYP's impairment without further exploration.
- 14.9.3 For more information regarding Trust settings' specific support and arrangements for CYP with SEND, as per the <u>SEND Code of Practice</u>, <u>The SEND local offer | Shropshire Council</u> and <u>Education for children with health needs who cannot attend school</u>, please refer to the MAT SEND Policy and individual settings' SEND Information Report.

14.10 CYP who are lesbian, gay, bi, trans or gender and identity questioning (LGBTQ+)

- 14.10.1 The fact that CYP may be LGBTQ+ is not in itself an inherent risk factor for harm, online and offline, however, CYP who are LGBTQ+ can be targeted by other CYP. In some cases, CYP who are perceived as LGBTQ+ (whether they are or not) can be as vulnerable as CYP who identify as LGBTQ+.
- 14.10.2 All staff will ensure inclusivity of LGBTQ+ CYP as part of the statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education curriculum and will receive training to provide a safe space for LGBTQ+ CYP to share their concerns. A trusted adult will be identified to support CYP wanting, or in need of, support.

14.11 Children requiring mental health support

- 14.11.1 Mental health problems can, in some cases, be an indicator that a CYP has suffered or is at risk of suffering abuse, neglect, exploitation, and/or harm. CYP who have mental health needs will often need early help or support to avoid their safety and welfare being compromised.
- 14.11.2 All Trust schools have a Designated Mental Health Lead who is a member of, or supported by, the Senior Leadership Team. All schools have routes to escalate and refer, and accountability systems as per Promoting and supporting mental health and wellbeing in schools and colleges GOV.UK (www.gov.uk)

14.12 Reviewing the needs of CYP potentially at greater risk, and taking action

- 14.12.1 For all CYP, particularly for those who potentially at greater risk of harm, all Trust schools run a Wave model whereby the needs of CYP are reviewed at least every three weeks. Supported by the Trust's Learning for Life Framework WAVE Guidance document, all schools convene multiple professionals' meetings from within the school, to discuss necessary adaptations (WAVE 1), interventions (WAVE 2), individualised (WAVE 3) and bespoke (WAVE 4) support required, including any possible external agency involvement or referrals, to bring about an improvement in circumstances and outcomes for the CYP. As part of the review of the WAVE, staff will liaise with the Headteacher, Senior Leadership Team, D/DSL, SENDCo, DT for P/CLA, Attendance Lead, and Raising Standards Leads (or equivalent) to explore if the behaviour demonstrated is possibly indicative of an unmet need, and whether external assessment or support is required.
- 14.12.2 During Wave reviews, Appendix B: Learning for Life Framework will be utilised to review CYPs positions on the Wave, and necessary next steps.

15 Child-on-Child Abuse

- 15.1 As set out in our <u>safeguarding statement</u>, we will not tolerate the abuse and/or harm of children. This includes where CYP abuse other CYP (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse.
- 15.2 We want to ensure that no child-on-child abuse takes place in our schools. However, we understand that we cannot just rely on CYP telling us that they are experiencing abuse from other CYP. Staff should understand that even if there are no reports in school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their <u>professional development and support</u> and <u>supervision</u>, which does not just rely upon CYP telling someone. Staff are expected to follow our Appendix G: Child-on-Child Abuse Procedures.
- 15.3 All schools monitor patterns of child-on-child incidents including those involving abuse and/or harm, to ensure that all are aware of and able to minimise and respond to any emerging themes or patterns of abusive behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by Local Governing Bodies and in turn Trustees.
- 15.4 This section should be read in conjunction with <u>MAT Behaviour [...] Policy and Procedures</u>: Section 4 Tackling Bullying.
- 15.5 All incidents of discriminatory treatment, bullying and harassment will be investigated thoroughly in accordance with the MAT Behaviour [...] Policy and Procedures and recorded on CPOMS. Responses to substantiated incidents will be treated as a safeguarding concern and consider the needs of both the victim and perpetrator, and necessary actions to mitigate against recidivist behaviours, including education and intervention. As evidence indicates, perpetrators are likely to have themselves previously been victims of abuse, neglect, exploitation, and/or harm and therefore must be reviewed as a victim in their own right with appropriate subsequent support.
- 15.6 Appendices F, G and H should be used to support schools in their management of any allegation of child-on-child abuse, their response and then any necessary risk assessment.

15.7 Prevention of child-on-child abuse

- 15.7.1 We aim to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:
 - i. expecting all staff and Governors/Trustees in our Trust adhere to and promote the commitments we make in our safeguarding statement.
 - ii. ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that our D/DSL 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.
 - iii. being clear how we expect our CYP to behave towards one another. Our MAT Behaviour [...] Policy and Procedures, and school-specific protocols, outline these expectations; how schools will support CYP to understand and fulfil them; and how

schools will prevent and respond to behaviour which falls below expected standards (including all forms of bullying - see MAT Behaviour [...] Policy and Procedures: Section 4 - Tackling Bullying). Where behaviour also indicates child-on-child abuse, staff will adhere to the processes outlined in this section.

- iv. ensuring we are teaching our CYP how to keep safe.
- v. making sure that CYP who experience or are at risk of experiencing abuse and/or harm from other CYP are identified, feel supported and safeguarded from further harm.
- vi. 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.
- vii. making sure that we are taking positive action to ensure that <u>CYP potentially at</u> <u>greater risk of harm</u> are not disproportionately impacted by child-on-child abuse in our school.

15.8 What is child-on-child abuse?

15.8.1 Child-on-child abuse:

- i. is when a CYP or group of CYP inflicts harm or fails to act to prevent harm to another CYP.
- ii. includes actions that cause harm; this can be a single serious incident or a pattern of incidents.
- iii. includes harm caused to a CYP that may be physical, emotional and/or psychological, and can include witnessing the ill treatment of others.
- iv. can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context, we know that child-on-child abuse can take place in spaces and at times of the school day where CYP are less likely to be supervised. We also know that 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.
- v. can be defined in different ways (examples are outlined in Keeping Children Safe in Education 2025: Part 1 and Part 5).
- vi. may mean a CYP experiences one or multiple types of child-on-child abuse at the same time.

15.8.2 Child-on-child abuse can manifest in different ways, such as:

- i. bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- ii. abuse in intimate relationships between CYP (also known as teenage relationship abuse)
- iii. physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

- iv. sexual violence and sexual harassment including AI-generated or digitally altered sexual or abusive imagery and deepfake content.
- consensual and non-consensual sharing of nude and semi-nude images and/or ٧. videos. Please also see also online safety advice and protocol for responding to such incidences
- causing someone to engage in sexual activity without consent, such as forcing vi. someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- vii. upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks or to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- initiation/hazing type violence and rituals. viii.

CYP who are more vulnerable to child-on-child abuse

- 15.9.1 Please read this alongside CYP potentially at greater risk of harm.
- 15.9.2 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.
- 15.9.3 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, neglect, exploitation, and/or harm or some other form of adverse experience² in their life. CYP who harm other CYP may have power or privilege over CYP they are causing harm to but can also be powerless or vulnerable in other part of their lives.
- 15.9.4 Child-on-child abuse is harmful to all CYP involved.
- 15.9.5 Evidence³ indicates that children from certain groups are more vulnerable to childon-child abuse. This includes children who:
 - i. have special education needs and/or disabilities, and/or health issues.

² See <u>Understanding trauma and adversity | Resources | YoungMinds</u> for further information.

³ Evidence sources:

Keeping Children Safe in Education 2025; 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-child abuse: a resource for schools and colleges (farrer.co.uk)

- ii. have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes CYP who are previously or currently looked after or who have a social worker due to safeguarding concerns.
- iii. are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- iv. are from Black, Asian 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^{4.}
- v. identify as Lesbian, Gay, Bi-Sexual, Transgender or Gender or Identity Questioning (LGBTQ+). These CYP are more likely to be the target of bullying and/or haterelated behaviour/crime and harmful sexual behaviour and abuse.
- vi. are female: girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.
- vii. are male: boys are more vulnerable to experiencing bullying that is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).
- 15.9.6 Where a CYP has several differences and would fall into multiple groups above; this further increases their vulnerability.

15.10 When is child-on-child behaviour considered abusive?

- 15.10.1 We recognise 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.
- 15.10.2 In considering whether behaviour is abusive; staff should consider

15.10.3 The impact on the CYP affected by the behaviour

- i. 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.
- ii. The needs and circumstances of the CYP who is identified as being potentially harmed should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

⁴ Adultification bias within child protection and safeguarding (justiceinspectorates.gov.uk)

- iii. 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)
- iv. 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.

15.10.4 The behaviour of the CYP who is/are causing harm

i. 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, i.e., 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.

15.11 Features of abusive behaviour⁵ can include:

- i. 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)
- ii. a misuse of power over the CYP who is being harmed.
- iii. 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.
- vii. intrusive behaviour: not considering or enabling the CYP being harmed to freely agree and/or consent to the behaviour.
- viii. an element of control, coercion and/or force.
 - ix. threats or enactment of physical/sexual violence (this does not always have to be enacted, but where it is so would heighten the level of concern).
 - x. evidence that a CYP is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

15.12 Our response to child-on-child abuse

15.12.1 In most instances, schools will use the MAT Behaviour and Tackling Bullying [...] Policy and Procedures 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.

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

i. Part 5 Keeping Children Safe in Education 2025

⁵ Adapted from Hackett Continuum as described in <u>Understanding sexualised behaviour in children | NSPCC Learning</u>. 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 <u>Farrer and Co (2022) page 35-36</u>)

- ii. Use of reasonable force in schools
- iii. Searching, screening and confiscation at school
- iv. Sharing nudes and semi-nudes: advice for education settings working with children and young people
- v. When to call the police: guidance for schools and colleges.

15.13 Risk and needs assessment

- i. 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.
- ii. The Trust deems 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.
- iii. 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.
- iv. The risk and needs assessment will be completed taking account of information from all key staff (and relevant involved professionals) working with the CYP, as well as their responsible adults. It will also include the views and feelings of the CYP, where this is safe and appropriate to do so.
- v. The risk assessment will be shared will all staff and relevant involved professionals who work with the CYP as well as responsible adults. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.
- vi. In circumstances where children are displaying sexual behaviour towards other children that raises concern all schools' DSLs are trained in and will use the Brook Traffic Light Tool to inform the risk and needs assessment.
- vii. Our template risk and needs assessment can be found in Appendix H.

15.14 Response

- i. The responsible adults of **all CYP involved** will be notified of and involved in our response. We will only share the details of other CYP to family members who do not have parental responsibility for them where we have consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to <u>Record Keeping and Information Security</u>).
- ii. The risk and needs assessment will inform the response taken. The following responses will be considered (more than one response may occur concurrently):

i. Manage internally

In alignment with the MAT Behaviour and Tackling Bullying [...] Policy Procedures and school-specific appendices, and the <u>Wave Reviews</u>, address 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 experiencing harm. This may also include actions to make locations/school infrastructure (including online) safer; adapting curriculum to ensure the school is <u>teaching CYP how to keep safe</u> or <u>Working in Partnership</u>.

ii. Offer Early Help/Targeted Early Help

This could include offering and/or referring any CYP involved to enhanced or specialist support services to address the needs/risks identified in line with the SSCP Thresholds document and locally available provision. Any referrals for support will require parental (responsibility) consent and will take account of CYP's wishes and feelings.

iii. Raise concerns to Children's Social Care in line with the SSCP Thresholds document.

iv. Report to the Police

Trust schools will take account of When to call the police: guidance for schools and colleges.

15.15 Recording and monitoring

All child-on-child abuse concerns and responses will be recorded and stored on CPOMS for all involved CYP (please refer to Record Keeping and Information Security). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on either CPOMS (Primary and Specialist) or Arbor (Secondary). D/DSLs and Behaviour Leads will regularly review those incidents recorded on Arbor for patterns to ensure no indicators of child-on-child abuse, or abuse of any kind, is missed between systems.

16 Staff Safeguarding Concerns: Recognise, Respond, Report

16.1 Recognise

Be alert and curious.

Pay attention to possible **signs or indicators** of abuse and/or harm from the CYP to themselves or others, either from your own observation or what the CYP/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).

- 16.1.1 Any CYP in any family could become a victim of abuse and/or harm. Abuse and safeguarding issues are complex and can often involve a CYP experiencing multiple issues or types of abuse. Staff should always maintain the attitude that abuse could happen here and practice professional curiosity. Staff should be particularly alert to CYP potentially at greater risk of harm and remain vigilant in identifying the signs and indicators which could indicate a concern that a CYP is being or could be at risk of abuse.
- 16.1.2 As well as maintaining their professional development, staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: Keeping Children Safe in Education 2025: Part 1 and Annex B. and SSCP Contacts and Definitions.
- 16.1.3 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 and communication**. Signs and indicators can be recognised by staff through:
 - i. Concerns shared directly by a CYP: staff must not rely on CYP telling them they are experiencing abuse. CYP may not recognise, feel ready, know how to, or be able to communicate concerns or worries. Staff must therefore act in accordance with our <u>safeguarding statement</u>; <u>work in partnership</u> and use <u>professional curiosity</u> and skills in developing trusted and supportive relationships in their everyday work with CYP.
 - ii. **Observations:** in person or online (including online behaviour in school) of a CYP or someone else (for example a family member, someone working or visiting the school).
 - iii. **Concerns shared by others:** either verbally or in written communications. This could be family members, other CYP, other staff members or other adults who may be working in or with the school, or individual CYP.

- iv. Other systems we have in place: including our filtering and monitoring systems and information from other agencies through working in partnership, etc.
- 16.1.4 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, i.e., other family circumstances health or learning need, 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. This will be explored in detail as part of the Wave Reviews.

16.2 Respond

Ensure the immediate safety of the CYP potentially at risk.

If there is immediate danger:

<u>Take action</u> as necessary to protect the CYP, others and yourself (including contacting emergency services on 999 and <u>refer child protection concerns</u>).

<u>Apply other relevant policies/procedures</u> (i.e., MAT Behaviour [...] Policy and Procedures, MAT First Aid Policy; MAT Attendance Policy, MAT Staff Code of Conduct Policy and <u>our response to child-on-child abuse</u>, 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.

16.2.1 Immediate safety

- i. If a CYP is in immediate danger, staff must take individual action as necessary to keep the CYP, others, and themselves safe. They must:
 - i. contact emergency services if someone is in immediate danger (999).
 - ii. if necessary, refer child protection concerns themselves (follow <u>multi-agency</u> <u>referral: reporting concerns (MARF)</u>)
 - iii. work in line with the MAT Behaviour [...] Policy and Procedures and <u>Use of reasonable force in schools guidance</u>.
 - iv. report and allegations of harm by adults in a position of trust or unsafe practices in school in line with Ensuring Safe Staff.

16.2.2 Other relevant policies/processes

i. Staff may need to follow other school safeguarding policies/processes (see <u>Legislation</u>, <u>Standards and Guidance</u>) 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, <u>Child-on-Child Abuse</u> should be referred to.

16.2.3 Injuries incurred out of school

- i. In primary settings, at the beginning of each session or school day, CYP's responsible adult(s) are requested to notify the school of any accidents, incidents or injuries which may affect their child before leaving them at the setting/school. A note will be made of any existing injuries and how the injury was received will be recorded. A body map may be used to indicate any marks/bruises (refer to body map on CPOMS or where this is not available, multi-agency referral form (MARF)
- ii. In secondary settings, injuries that have been sustained non-accidentally or may affect a CYP's ability to access the school site safely, should be reported to the school's office staff so that relevant staff can be informed and a Personal Emergency Evacuation Plan (PEEP) can be completed to ensure the safety of the CYP on site (see Appendix B, MAT Supporting Children and Young People with Medical Conditions Policy).
- iii. Any serious injury occurring in the school/setting e.g., broken bone, is reported to Health and Safety Executive (HSE) via RIDDOR. This is also reported to Ofsted within 14 days.

16.2.4 Seek views and gather information from the CYP and others

- i. Where safeguarding concerns are identified, staff should (where it is safe to do so) always seek the views of and directly from:
 - i. CYP (where appropriate and depending on the circumstances and their role with CYP)
 - ii. 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)
 - iii. those with parental responsibility (if necessary and depending on the circumstances and their role).
- ii. Any uncertainty about seeking views should be discussed with the DSL.
- iii. If any need for help and support are identified, responsible adults and CYP should always be asked for their consent to share information with other organisations 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 others section.
 - 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.
 - ii. 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. This support may be offered from the SENDCo or other agencies.

16.2.5 When concerns are directly shared by a CYP

- i. CYP are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.
- ii. When CYP share the details of or feelings about abuse, 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 (see Recognise).
- iii. It takes a lot of courage for CYP to share that they feel unsafe or are experiencing abuse. There are many reasons why CYP do not share their experience, i.e., uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding, or ability to recognise and explain their experience.
- iv. When CYP are sharing their concerns, staff should:
 - **Listen to the CYP:** please refer to this <u>NSPCC poster</u>.
 - **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 whom so that they can receive the best support. Think about when to do this to make sure the CYP feels safe and can continue to trust you and others.
 - Reassure and 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 CYP'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 <u>Reporting</u> concerns section.
 - Seek support if you feel distressed.

16.3 Report

Where there is an immediate risk of significant harm, report immediately to the DSL.

Record your concerns, decisions, actions and outcomes on CPOMS.

When concerned about a member of staff or someone else in the school, report in line with Ensuring Safe Staff.

16.3.1 Record concerns

All safeguarding concerns must be recorded by the staff member in writing via CPOMS and the D/DSL alerted to the concern. 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).

16.3.2 Each safeguarding concern record should include:

- i. a clear and comprehensive summary of the concern.
- ii. details of how the concern was followed up and resolved.
- iii. any action taken, decisions reached and the outcome.
- 16.3.3 If staff are unsure of the recording requirements, they should seek advice from the DSL.

17 Designated Safeguarding Lead Response

- 17.1 Safeguarding concerns can be raised by staff as above, but may also be raised to the DSL by:
 - i. CYP, families, or visitors to the school.
 - ii. other agencies (see Working in Partnership).
 - iii. the school's ICT filtering and monitoring systems.
 - iv. see school-specific appendices for further methods of reporting.
- 17.2 The Designated Safeguarding Lead will:
 - i. consider and assess the concern.
 - ii. 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:
 - Keeping Children Safe in Education 2025
 - Working Together to Safeguard Children 2023 (particularly Chapters 1 and 3)
 - SSCP Threshold Document
 - other relevant local tools and pathways (West Midlands Procedures)
 - When to Call the Police Guidance for Schools

17.3 Decide on what action to take

- 17.3.1 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 ensure staff are safe in school.
- 17.3.2 In making decisions, the DSL will work in partnership with the Headteacher and other relevant staff in line with their <u>roles and responsibilities</u>, and any other organisations as appropriate (see <u>Working in Partnership</u> and <u>Record Keeping and Information Security</u>).
- 17.3.3 Actions could include one or more of those listed below:

i. Manage internally

In alignment with the MAT Behaviour and Tackling Bullying [...] Policy Procedures and school-specific appendices, and the <u>Wave Reviews</u>, address the needs/risks identified including 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. 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 experiencing harm. This may also include actions to make locations/school infrastructure (including online) safer; adapting curriculum to ensure the school is teaching CYP how to keep safe or Working in Partnership.

ii. Offer Early Help/Targeted Early Help

This could include offering and/or referring any CYP involved to enhanced or specialist support services to address the needs/risks identified in line with the SSCP Thresholds document and locally available provision. Any referrals for support will require parental (responsibility) consent and will take account of CYP's wishes and feelings.

iii. Raise concerns to Children's Social Care in line with the <u>SSCP Thresholds</u> document.

iv. Report to the Police

Trust schools will take account of When to call the police: guidance for schools and colleges.

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

Other local referral processes will also be followed as applicable including referring to relevant multi-agency forums and processes as outlined in <u>relevant local tools and pathways i.e., Prevent Radicalisation; ensure Online Safety; Multi-Agency Risk Assessment Conference).</u>

17.4 Record actions, decisions, and outcomes

On the child protection file in CPOMS, and in line with <u>Record Keeping and Information Security</u> the DSL will record actions, decisions and outcomes. This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see <u>Working in Partnership</u>).

17.5 Manage and oversee any ongoing response.

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 CYP, families, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

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

18 Equality, Diversity Inclusion and Belonging

18.1 Our Equality, Diversity, Inclusion and Belonging Policy ensures the equality of education and opportunity for all CYP, irrespective of race, gender, disability, faith or religion or socio-economic background, or other protected characteristic. Repeated racist incidents or a single serious incident may lead to consideration under safeguarding CYP procedures. A separate log of these incidents will be kept and shared on a regular basis with Governors and the Local Authority. We also ensure emerging technologies, including AI, are used inclusively and do not reinforce bias or discrimination.

19 Health and safety

19.1 The Trust's Health and Safety Policy reflects the consideration we give to the safeguarding of our CYP both within the school environment and when away from the schools when undertaking school trips and visits.

20 Conclusion

- 20.1 The legal responsibility of the Trustees and the Local Governing Body of each school for safeguarding the welfare of CYP goes beyond basic child protection procedures.
- 20.2 The duty is to ensure that safeguarding permeates all activity and functions, surrounding and supporting their education and general welfare.

21 Reviewing the Safeguarding & Child Protection and Procedures Policy

- 21.1 This policy is subject to a regular cycle of monitoring evaluation and review by the Trust's Designated Safeguarding Lead each school's Designated Safeguarding Leads.
- 21.2 The policy should also be read alongside the Trust's other policies:
 - i. MAT Attendance Policy
 - ii. MAT Behaviour and Tackling Bullying [...] Policy and Procedures
 - iii. MAT Supporting Children and Young People with Medical Conditions Policy
 - iv. MAT Health and Safety Policy
 - v. MAT ICT Policy
 - vi. MAT Relationship, Sex and Health Education Policy
 - vii. MAT Recruitment & Selection Policy
 - viii. MAT Social Media Policy

- ix. MAT Special Educational Needs and Disabilities Policy
- x. MAT Staff Code of Conduct Policy
- xi. MAT Educational Trips and Visits
- xii. MAT Children currently and Previously Looked After Policy
- xiii. MAT Whistleblowing Policy
- xiv. MAT Lettings Policy
- xv. MAT Artificial Intelligence (AI) Policy
- 21.3 The Governors and Trustees receive an amended/updated policy annually.

22 Appendix A - Designated Leads for each school within the Marches Academy Trust & Link Governors for Safeguarding

- i. All schools' lead contacts are published on school websites here: 'Get in Touch: Key Staff Contacts'
- ii. Out of hours contact details will be made available to staff via email out of hours replies
- iii. Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies and Safeguarding Partnerships via email out of hours replies

23 Appendix B - Learning for Life Framework



24 Appendix C - File Transfer Record and Receipt

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

NAME OF CHILD OR YOUNG PERSON:	
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.

25 Appendix D - Serious injuries, accidents and illnesses

Applicable to early years settings only

The setting must tell Ofsted about any of the following in relation to serious injuries, accidents and illnesses:

- i. the death of a child
- ii. anything that requires resuscitation
- iii. admittance to hospital for more than 24 hours
- iv. a broken bone or fracture
- v. dislocation of any major joint, such as the shoulder, knee, hip or elbow
- vi. any loss of consciousness
- vii. severe breathing difficulties, including asphyxia
- viii. anything leading to hypothermia or heat-induced illness
 - ix. any confirmed cases of coronavirus (COVID-19) in staff or CYP

Minor injuries

The setting does not need to tell Ofsted about minor injuries, even if treated at a hospital (for less than 24 hours). These include:

- i. animal and insect bites, such as a bee sting that does not cause an allergic reaction
- ii. sprains, strains and bruising, for example if a child sprains their wrist tripping over their shoelaces
- iii. cuts and grazes
- iv. minor burns and scalds
- v. dislocation of minor joints, such as a finger or toe
- vi. wound infections

Eyes

The setting must report to Ofsted if a CYP suffers any loss of sight, whether it is temporary or permanent. You must also tell us about any:

- i. penetrating injury to the child's eye
- ii. chemical or hot metal burn to the child's eve

Substances and electricity

If a CYP in our care suffers any injury from, or requires medical treatment for, any of the following situations we must tell Ofsted:

- i. from absorption of any substance:
 - by inhalation
 - by ingestion
 - through the skin
- ii. from an electric shock or electrical burn
- iii. where there is reason to believe it resulted from exposure to:
 - a harmful substance
 - a biological agent
 - a toxin
 - an infected material

The setting must fulfil our legal requirements and submit the online report to Ofsted as soon as reasonably practicable, but no later than 14 days by completing the online reporting process at https://www.gov.uk/guidance/report-a-serious-childcare-incident

26 Appendix E - Alternative Provision Quality Assurance Checklist



Name of alternative provision:

Name of person completing checklist (from host school):

This quality assurance document must be completed **prior** to working with a new alternative provision and **annually** thereafter, with regular site visits throughout the year (**at least termly**). Where certificates or evidence cease to be valid, renewals are to be collated throughout the academic year. Where provisions are multi-site, evidence and visits to be collated for each site where CYP attend.

1. List of Documentation to be Obtained from Alternative Provision

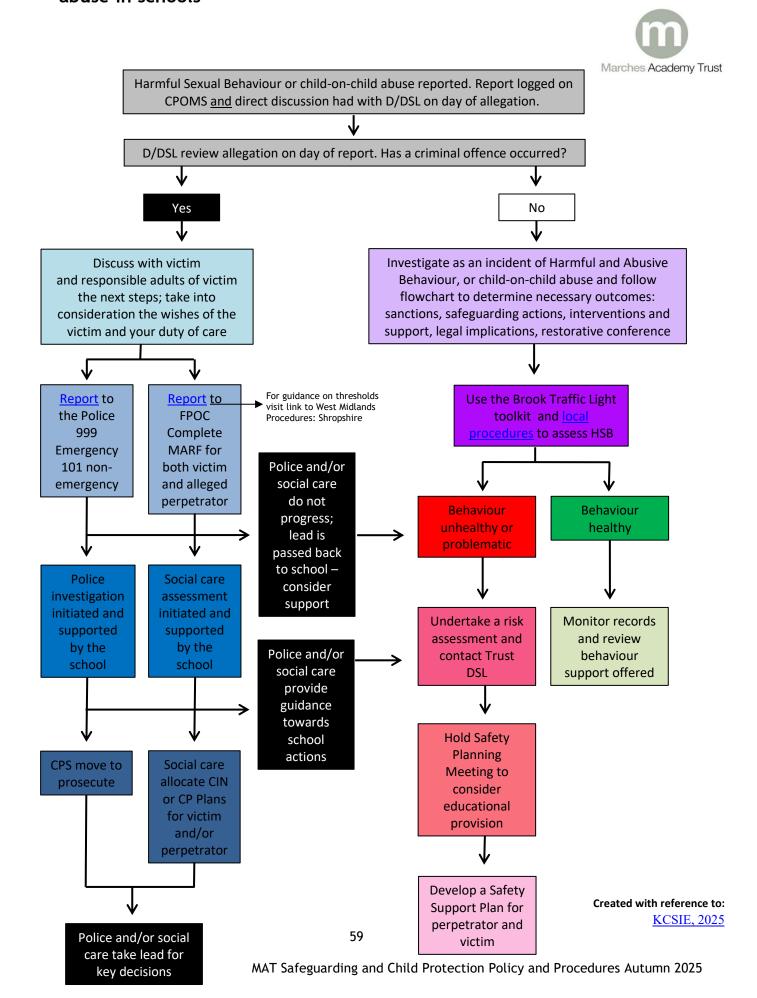
1. Safeguarding Documentation:	Y/N	Date & initial
Signed copy of Service Level Agreement (SLA)		
Signed copy of Annual School Registration declaration		
Copy of Safeguarding/Child Protection Policy		
Record of training for the Designated Safeguarding Lead (DSL)		
Acceptable technology use policy		
Lone working procedure and risk assessment		
2. Health & Safety Documentation:	Y/N	Date & initial
Copy of Health & Safety Policy incl. Fire risk assessment		
Public liability insurance (minimum £5 million)		
Fire safety and extinguishers documentation		
Site plan and risk assessment		
Regular PAT testing and water system tests		
Asbestos log (if required)		
Cleaning and chemical storage risk assessments		
3. Educational Provision Documentation:	Y/N	Date & initial
Copy of curriculum outline and organisation		
Behaviour policy supporting personal development		
Details of the available qualifications and training		
4. Progress Tracking and Communication:	Y/N	Date & initial
Procedures for tracking attendance and reporting absences		
Progress reports and communication with responsible adult(s)		
Risk assessments for all activities		
Weekly progress reports		
Referral form with a detailed pupil profile		
5. Other Policies and Documents:	Y/N	Date & initial
Training certificates (Safeguarding, Prevent, FGM Physical Intervention)		
ICT and mobile phone usage policy		
Governance and leadership structure		
Complaints procedure		

2. Checklist for Quality Assurance during Site Visit

Section	Requirement	Rating 1 = Unsatisfactory 2 = Requires Action 3 = Satisfactory			Comments or Actions Needed
	Service Level Agreement signed	1	2	3	
n.cr	Safe and secure site (staff DBS checks, visitor protocol)	1	2	3	
ardin	Safeguarding/Child Protection policies shared	1	2	3	
Safeguarding	Staff safeguarding training and knowledge	1	2	3	
Ŋ	Acceptable technology use policy in place	1	2	3	
	Lone working procedure and risk assessment	1	2	3	
	Site is safe and secure	1	2	3	
-⊈	Appropriate risk assessments	1	2	3	
t Safe	Fire and emergency procedures	1	2	3	
Health & Safety	Public liability insurance available	1	2	3	
포	First aid provision and qualified first aiders		2	3	
	Suitable equipment is available	1	2	3	
	Clear outline of qualifications and training	1	2	3	
on ress	Pupil profile shared from school utilised	1	2	3	
rovisi Prog	Child-centred approach to admission and learning	1 2 3			
Educational Provision and Tracking of Progress	Pupils feel safe and supported at all times	1	2	3	
ıcatio Track	Progress regularly assessed and shared	1	2	3	
Edt and	Adequate access to educational resources	1	2	3	
	Inclusive practice with behaviour management	1	2	3	
.H +J	Clear governance and leadership structure	1	2	3	
ship {	Communication maintained with referring school	1	2	3	
Leadership & Management	Attendance at multi-agency meetings	1	2	3	
> 7	Provider feedback on host school collaboration	1	2	3	

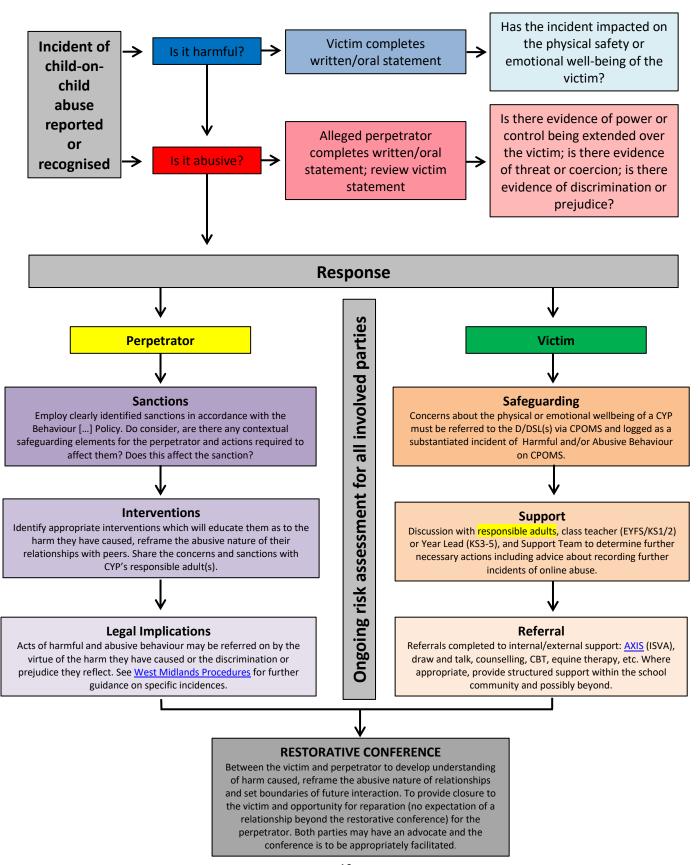
Date
Date

27 Appendix F - Workflow for managing reported incidents of child-on-child abuse in schools



28 Appendix G - Workflow for responding to child-on-child abuse in schools





29 Appendix H - Child-on-child sexual abuse: risk & needs assessment and version record

Notes on using this template:

Adapted from The Key



- (1) We've used "Child A" and "Child B" to signify the CYP involved, rather than saying "victim" and "alleged perpetrator". This is because you should avoid assigning guilt until a formal investigation has been conducted by the appropriate authorities.
- (2) Consider each question/consideration from the perspective of both CYP (in cases of multiple CYP, please outline in 'additional information' and add to the 'further comments' additional information as required) and be sure to do this in collaboration with them. Also consider the impact on, and needs of, the wider school community, and record any concerns or actions in the most appropriate column.
- (3) Work with your local multi-agency safeguarding team (MAST) when conducting this risk assessment and update it in response to any advice they provide. Some of the prompts may require input from other MAST agencies. Add specific questions and considerations based on the nature of each incident and on the advice provided.
- (4) Keep track of the changes you make (do not overwrite the original):
 - Create a new copy of the document
 - Update the version number at the top of the risk assessment
 - Record what has changed in the update log (at the end of the document)
 - Save the most recent version of the risk assessment in the appropriate places (for example, CPOMS [scan] or the child's safeguarding file)
- (5) This should be a living document you may need to update it as often as daily based on conversations with, and feedback from, the CYP and CYP's responsible adult(s) involved, feedback from staff, guidance from the MAST, or information from the police and children's social care.

Child A	
Child B	
Incident Number on CPOMS	
CPOMS Incident Date	
Additional Information (including details of other CYP involved if necessary and appropriate)	

Risk assessment - version [number]

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES
Details of the incident Record details of the incident from the point of view of both CYP	 How serious is the incident? Was it a crime? Do we need to make arrangements to limit contact between the CYP involved? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes) How did the school find out about it? Was it reported directly or by someone else with knowledge of the incident? 			Use this column to record additional information that may be relevant For example, previous, unrelated behavioural incidents
Social risks	 Do the CYP share a peer group? Are people in their friend group likely to take sides? Do they both attend your school? Do other people know about the incident? Do those people understand: Who they can talk to when they have concerns about the people involved, or about their own safety and wellbeing The importance of confidentiality If, and how, they may need to be involved in any further investigations Are they likely to be the subject of gossip, bullying or further harassment? Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)? Do they risk being alienated from their friend group(s) as a result of this incident? 			

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES
Physical risks	Do they feel, or continue to feel, physically threatened by the other CYP?			
	 Do you have reason to believe they pose a continued risk to the safety and wellbeing of the victim, or other CYP and staff? 			
	 Are they at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers) 			
	• Do they share classes/break times/etc.?			
	 Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? How can such contact be limited? 			
Environmental risks	Do they live in a home where violence or abuse has occurred?			
	 Do they live in or near an area or location known to police to be high risk for sexual harassment or assault? 			
	 Are they active on social media? If so, how? Do they know how to protect themselves from online grooming? 			
	What activities do they take part in outside of school?			
	• Are the CYP's responsible adult(s) clear about:			
	How the school (and partner agencies) are handling the incident?			
	Confidentiality?			
	The conduct expected of them while an investigation is ongoing?			

Further actions or comments:

ŀ	Hazard/Risk	What impact could the hazard/risk have?	Normal control measures:	Additional control measures:	Are control measures Adequate In place (Y/N/NA) (date as complete)		Assigned to:
1							
2							
3							

All parties involved in the completion of this risk and needs assessment:

Name	Role (this, for any responsible adult(s), should be 'mother of Child A', etc.	
Completed by:	Signature: Date:	
Authorised by:	Signature: Date:	

Authorisation must be sought from the DSL or Headteacher and a copy sent to Trust DSL as an encrypted email. Where the person completing the document is the DSL or Headteacher, it needs to be countersigned by another DDSL to ensure all appropriate measures have been considered. Upload a scanned version to CPOMS as a new incident or action of a previous incident and ensure confidentiality via tags. Ensure all actions communicated to respective personnel to guarantee the risk and need assessment is actioned correctly and effectively.

30 Appendix I - Safeguarding Assurance Document

Safeguarding Assurance

September 2025



Marches Academy Trust provides a high-quality education provision for children and young people attending all Trust schools.

This document outlines the structures, systems, processes, and protocols implemented to assure that it is meeting all requirements to safeguard CYP effectively and demonstrate good practice.

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
1. Trustees	A	There is a Trustee named as Lead for Safeguarding. The Trustee has extensive experience and meets half- termly with the Marches Academy Trust (MAT)	Trustee Notes							
		Designated Safeguarding Lead (DSL).	Half-termly							
	В	Training on KSCIE and updates, Trust Safeguarding and Child Protection Policy and Procedures, and	MAT Training Tracker							
	D	Governing Safeguarding (non-link governors) provided by the MAT Safeguarding Lead.	As appropriate (when training occurs)							
	С	Education Standards Committee review safeguarding via termly meetings; this information is provided by the Executive Director of Education (MAT DSL).	ESC Minutes							

				1	1 1	
2. Executive Leadership Group	A	A member of the Executive Leadership Group (ELG), Executive Director of Education, is the MAT's Designated Lead for Safeguarding and provides regular updates to the ELG following 58 weekly updates.	Weekly			
	В	All centrally determined policies, procedures and protocols are agreed by the Executive Leadership group prior to implementation.	As appropriate (when changes occur)			
	С	All schools have an Executive Link as check-in partner; Executive Links for schools are actively involved in the Executive Reviews completed termly. MAT DSL contributes to all Executive Reviews.	Executive Leadership Group minutes Termly			
3. HR	A	MAT meets its statutory requirements in relation to criminal record (DBS) checks and associated preemployment checks.	Single Central Record As appropriate (when changes occur)			
	В	Induction training program includes a safeguarding briefing and Raising Awareness Child Protection Level 1 training for all staff, including those not in regulated activity.	Trust Training Tracker As appropriate (when training occurs)			
	С	Headteachers and administrators are trained on their role requirements in completing the Single Central Record (SCR). Head of HR completes a report of compliance of the SCR annually evidenced by sampling school records.	Annually			
	D	Headteachers and those involved with school recruitment are trained in Safer Recruitment. The Recruitment & Selection (R&S) Policy and related R&S Toolkits are updated annually to further support safer recruitment.	Annually			

4. Central Services and all MAT schools	A	All staff have undertaken and are up to date with safeguarding training, both core and subject-specific subjects or themes (harmful sexual behaviours, Brook Traffic Light Tool, Child Exploitation (including Sexual), Domestic Abuse and Coercion, Neglect, etc.) This is delivered by either a trained member of the safeguarding team, the Local Early Help training offer, or a commissioned expert in the area, i.e., an NSPCC trainer or member of the Local Safeguarding Children Partnership.	MAT or school-specific training tracker (incl. Arbor) As need arises			
5. MAT Designated Safeguarding Lead (DSL)	A	The MAT Safeguarding Lead is an experienced Designated Safeguarding Lead with extensive safeguarding experience. The MAT DSL is a trained Ofsted Inspector who also sits within the Local Authority (LA) SEND and AP Partnership Board, attends termly LA Safeguarding Networks, provides training and consultancy to schools outside the MAT on inclusive practice and school improvement, including safeguarding as an area of specialism.	Personnel files			
	В	The MAT DSL writes and annually updates (or more regularly where necessary) the Safeguarding and Child Protection Policy and Procedures in response to Local Safeguarding Children Partnerships and national guidance, i.e., KCSIE. Schools then specify their school-specific processes and protocols in their school-specific appendices.	Trust Governance Officer - policies Schools' specific training trackers Annually (or more regularly, where required)			

	С	The MAT DSL provides an annual update (following KCSIE or other statutory updates) training, written centrally, as a template for schools' specific additional training, which is delivered on the first INSET session in September of each academic year.	MAT Inclusions Area Annually				
	D	The MAT DSL quality assures all schools' Prevent Risk Assessments and Community Safeguarding Plans.	MAT Inclusions Area Annually				
	E	The MAT DSL provides a MAT specific safeguarding review file for all settings which are completed and submitted for review termly as part of the School Improvement Record, within the School Overview File.	MAT Inclusions Area Annually				
	F	The MAT DSL quality assures (QA) the Section 9 and Section 11 ensures those called for LA QA are submitted on time.	MAT Inclusions Area Annually				
	G	School reviews evaluate schools' protocols, processes, and levels of compliance. This includes a review of the SCR, personnel files, the School Overview File, specifically the KPI, and other relevant platforms (Arbor, CPOMS) and documentation.	MAT Inclusions Area Annually				

Н	The MAT DSL coordinates MATi Scoping (VSR) termly (Autumn 2; Spring 2; Summer 2) to review the provision for the most vulnerable children and young people (CYP); this focuses on the schools' absenteeism, suspensions, permanent exclusions, higher needs funding (SEND), access to Alternative Provision (AP) and person-centred plans, and is particularly focused on the experiences of SEND (E and K), Pupil Premium (PP), Children Previously or currently Looked After (P/CLA), those with a Social Worker (SW), those on an Early Help (in-house or Targeted) Plan, or those who are trauma-experienced. This focuses on the model of check (compliance, effectiveness and planning); challenge, and champion (escalating to the ELG or other agencies where necessary). This includes support with the Escalation Policy where agencies are not fulfilling their duty of care.	MAT Inclusions Area Termly				
I	Following the School Reviews, the ELG meets with Headteachers of all schools to agree the school improvement support required. This is delivered through school-specific support, CPD training, twilights, professional learning modules, etc., and these are agreed in an Executive Review, termly. This includes any support required regarding safeguarding delivered by the MAT DSL or other delegated, and expertly trained professional.	School Review files Termly (rolling)				
J	The MAT DSL provides a networking opportunity to all schools to share updates, concerns, and best practice.	MAT Inclusions Area via TEAMS Termly				

	K	The MAT DSL provides a central resource base for training materials and updates to the Learning for Life Framework and WAVE Guidance to support schools in	MAT Inclusions Area Updates when			
		decision making and access to support and services, including those related to safeguarding.	necessary			
	L	The MAT DSL provides LGB with proformas to ensure that they can check, challenge and champion the schools they govern to ensure schools are both compliant and effective with regards to their statutory requirements, including safeguarding.	MAT Inclusions Area			
	М	The MAT DSL provides schools with proformas for a termly and annual update on their statutory requirements, including safeguarding.	MAT Inclusions Area			
	N	The MAT DSL delivers half-termly MATi Scoping update to the ELG.	ELG minutes Half-termly			
	0	The MAT DSL provides termly safeguarding report to trustees.	BOT minutes Termly			
	Р	The MAT DSL provides annual training, available to all trustees and members of school LGBs on effective governance of safeguarding. The MAT DSL offers support to governors upon request regarding safeguarding and effectively checking, challenging and championing safeguarding within their respective school(s).				
6. Education Improvement Director	A	MyVoice survey and OurVoice discussion completed of children and young people including checks regarding statutory expectation and requirements.	MAT Inclusions Area Annual			
	В	Half-termly update on wellbeing and support.	MAT Update (Friday) Hal-termly			

7. Director of Information Management and Attendance	A	Termly Safeguarding and Attendance Review completed in all schools.	School Review files Termly			
8. Schools	A	Each MAT school has a named link governor for safeguarding who undertakes training as part of their role, and a DSL with a team of deputies, who undertake training at least biennially.	Schools' specific training tracker and personnel files			
	В	Each MAT school reviews the safeguarding processes, protocols and compliance at least termly and submits a report to the LGB outlining their position. Included in the cycle is a summary of behaviour and wellbeing ensuring a holistic view of safeguarding and welfare for the most vulnerable CYP is presented.	LGB minutes Half-termly			