

Safeguarding and child protection policy

including child-on-child abuse and low-level concerns
guidance

September 2024

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Section 1 Policy statement

1 Mission, vision, and values

Diverse Academies Trust is committed to the safeguarding and protection of all our children. Underpinned by our Trust vision 'To inspire. To raise aspiration. To create brighter tomorrows', we aim to achieve outstanding practice enabling our children to achieve their fullest potential, free from harm and abuse of any kind.

In adhering to this principle, we focus on providing a safe and welcoming culture and environment for all children implemented through our values 'We empower. We respect. We care'.

2 Purpose and intent

The intent of this policy is:

- to provide clarity on what we do to keep children safe, including looking after their welfare, safety, well-being, and health.
- to provide a framework which enables all adults involved in our Trust to be fully equipped to fulfil their responsibilities in exercising their safeguarding duty.

Multi academy trust safeguarding arrangements

We believe that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and keep them safe. We are committed to acting in a way that protects them.

The requirements of the Trust and each academy to safeguard and promote the welfare of all children and young people are embedded in legislation, government, and local authority guidance. Therefore, the policy of the Trust must be, and is, in line with this wider framework.

Diverse Academies Trust has a responsibility under Part 3: the Education (Independent Academy Standards) Regulations, 2014, to ensure that arrangements are made to safeguard and promote the welfare of pupils in our academies, and that such arrangements have regard to any guidance issued by the Secretary of State.

The government guidance documents, ['Working Together to Safeguard Children' \(2023\)](#) and ['KCSIE' \(2024\)](#), are the essential national safeguarding documents and give practical guidance on implementing legal requirements.

Each academy should make a copy of each accessible to staff.

All adults working within the Trust must read and acknowledge understanding of Part One (or Annex A, if appropriate) of the latest version of [‘Keeping Children Safe in Education’](#) (KCSIE).

Staff with other specific safeguarding responsibilities should read all parts of KCSIE.

When carrying out the Prevent Duty as required under section 26 of the Counter Terrorism and Security Act, the Trust’s academies will follow the Home Office’s [‘Revised Prevent Duty guidance March 2024: for England and Wales’](#) and the DfE’s general advice ‘Protecting children from radicalisation: the Prevent Duty’. Each academy has a setting specific Prevent self-assessment, and when applicable, risk assessments for individual children who have been referred to Prevent or who have indicated a potential risk of radicalisation.

Each academy has in place its own published Safeguarding and Child Protection list of contacts which outlines the key personnel regarding safeguarding in each setting.

A link to the Trust safeguarding and child protection policy document must be published on each individual academy’s website.

3 Roles and responsibilities

Safeguarding is everyone’s responsibility.

Trustees are responsible for ensuring that the policy is compliant in meeting statutory guidance and fulfils our first duty to keep children safe in our academies. They provide clarity of vision, ethos, and strategic direction in safeguarding management, led by the appointed link trustee for Safeguarding.

Responsibility for meeting statutory requirements in each academy is delegated to Local Academy Committees and appointed safeguarding governor.

Executive principals and principals are responsible for the implementation of policy in the academy.

Academies appoint a Designated Safeguarding Lead (DSL) to coordinate all safeguarding and child protection procedures at the academy, including those related to online safety. They will take lead responsibility for this area.

The Strategic Development Lead for safeguarding is appointed by the Trust to monitor the effective implementation of this policy for the benefit of all children.

Role	Name	Contact
Designated MAT Trustee for Safeguarding	Paul Simpson	PSimpson@gov.diverse-ac.org.uk
Strategic Development Leader - Safeguarding	Patrick Knight	pknight@diverse-ac.org.uk
Multi Agency Safeguarding Hub	MASH Notts	mash.safeguarding@nottscqcsx.gov.uk 0300 500 80 90
Children's Safeguarding (Lincs)	Lincs	01522 782111 Out of hours – 01522 782333
Local Authority Designated Officer (Notts)	Eva Callaghan	0115 8041272 eva.callaghan@nottscqcsx.gov.uk
Local Authority Designated Officer (Lincs)	LADO referral form	www.lincolnshire.gov.uk/safeguarding/lscp/7 01522 554674

All staff and adults within our Trust will know who their respective academy DSL is and who else is designated safeguarding leader trained within the academy and / or within the MAT central team.

4 Benefits

Every child will thrive, be safe from harm, and have their needs met. Concerns will be identified at the earliest point with intervention and support provided at the right time.

Through adoption of this policy, we encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.

5 Quality assurance

Robust safeguarding practices and procedures are key to supporting and safeguarding the children and young people who access services from Diverse Academies. Effective quality assurance measures are essential in ensuring the practices and procedures are fit for purpose.

Our quality assurance includes auditing compliance in recruitment, the Single Central Register and staff training; providing local academy committees with a framework of strategic areas to address with academy leaders; regular testing of culture including staff understanding of key safeguarding areas, pupil voice and academy responses to the mental health and child-on-child abuse agenda;

and through the Academy Improvement Review, identifying areas of strength and working with academy leaders on continuous improvement in meeting our wider safeguarding duty.

Section 2 Policy

6 National guidance and statutory requirements

This policy, and the Trust protocols, always follow the latest statutory guidance found in [KCSIE](#) , and the latest child protection legislation found in [Working Together to Safeguard Children 2023](#).

This policy should be read alongside and in conjunction with the following Trust policies:

- Anti-bullying
- Attendance
- Behaviour
- Equality
- Safer recruitment
- Special Educational Needs and Disability
- Supporting students with medical conditions
- Suspensions and exclusions
- Staff code of conduct
- Staff disciplinary

In addition, we refer to: Section 157, Education Act (2002), Human Right Act (1998), Equality Act (2010), Children Act (1989/2004), Children and Social Work Act (2017), The Education (Independent School Standards) Regulations (2014), The Domestic Abuse Act (2021), PACE Code C (2019), Prevent duty guidance for England and Wales (2023), Section 26, Counter Terrorism and Security Act (2015), Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents, and carers (HM Government May 2024), Disqualification under the Childcare Act 2006 (Updated August 2018), Child abuse concerns: advice for practitioners (DfE, March 2015), Children Missing education: statutory guidance for local authorities (September 2016), Teacher Standards (2012) and the Safeguarding Vulnerable Groups Act (2006).

Our designated staff are aware of the [key changes to Working Together 2023](#) and are committed to ensuring that inter-agency working with our academies is as robust as possible.

We follow local authority safeguarding procedures dependant on location of both the academy and the child, in accordance with the Safeguarding Children Partnerships – [Nottinghamshire](#) and [Lincolnshire](#).

7 Definitions

Safeguarding is the ‘umbrella’ term for everything done to support children and young people and keep them safe and promote their welfare.

The term ‘children’ applies to everyone under the age of 18.

The terms ‘pupils or students’ apply to children or young people attending any one of our settings (2-19 years of age).

‘KCSIE’ now defines safeguarding and promoting the welfare of children as:

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

Child Protection is defined in ‘Working Together to Safeguard Children as:

- the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement (whenever possible), where this is in the best interests of the child
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the [Children’s Social Care National Framework](#)

8 Wider roles and responsibilities

8.1 All staff

All staff (includes supply/trainee/voluntary) **must:**

- Maintain and promote the highest standards of safeguarding practice
- Always be aware of the needs of young people and be vigilant for any possible signs of abuse or risks
- Undertake required training for their role (statutory and additional) and engage in regular updates provided by the academy and Trust

- Understand and implement the process for making referrals to social care and for statutory assessment
- Understand and implement the process for making referrals where there are concerns about staff or adults working for the Trust including those concerns that do not meet threshold ('Low Level Concerns') as set out in the Trust [Staff Disciplinary Policy](#)
- Read and understand part one of the latest iteration of 'KCSIE'
- Understand the importance of, and promote, the Early Help process

8.2 Academy principal (supported by the executive principal)

The academy principal is responsible for deploying staff with clear roles and responsibilities to implement this policy to a high standard, going beyond compliance and striving for the very best practice, including a minimum of the DSL and at least one other Deputy DSL. In some academies, the principal and DSL may be the same person.

The academy principal (supported by the executive principal) must:

- Develop, maintain, and promote a culture of safeguarding across the academy and the Trust, with parents and in the wider community
- Ensure all adults are well trained (including in on-line safety), and able to fulfil their role to a high standard (including those with designated responsibility for Children who are Looked After)
- Working with the DSL, maintain an overview of safeguarding cases, providing supervision, support, and quality assurance of processes across the academy
- Designate a DSL and at least one other deputy DSL, ensuring sufficient coverage and time to always meet requirements to a high standard
- Work effectively in partnership with Trust HR leads to ensure all recruitment processes are followed to a high standard and any concerns regarding staff are immediately acted upon
- Work closely and proactively with the local governing body and designated Safeguarding Governor in fulfilling their role
- Monitor the effectiveness of safeguarding systems, especially procedures, and review, make and report any changes that are required

8.3 Designated Safeguarding Lead

Designated safeguarding leads **must**:

- Develop, promote, and uphold a culture of openness and information sharing

- Ensure they are well trained and informed, such that they understand and comply with all statutory guidance and requirements, accessing and sharing updates and information to develop the very best practice
- Liaise with the principal regarding ongoing enquiries under section 47 of the Children Act 1989, police investigations and ensure awareness of the requirement for a child to have an appropriate adult in relevant circumstances
- Ensure child protection policy and procedures are known, understood, and used appropriately by staff
- Ensure all staff and adults (including supply staff, volunteers, and student / trainee teachers) are well trained and understand their responsibilities in being alert to the signs of all abuse, and fully understand their responsibility for referring any concerns to the designated safeguarding lead, or to children's social care/police if a child is in immediate danger
- Develop and maintain clear procedures for safeguarding and child protection, ensuring that these are followed with regards to concerns, offering clear advice and support including determining referrals to social care
- Ensure all staff understand how to accurately record concerns, that all records are kept securely on the Trust system 'My Concern' and all related documents are uploaded
- Work effectively and proactively with the three safeguarding partners (Police, Clinical Commissioners (NHS) and children's services) to ensure appropriate and timely action is taken, escalating concerns where necessary in line with Local Authority procedures
- Ensure information is gathered (working with the Local Authority and other professionals) and shared effectively on transition both into the academy, internally between classes and where pupils move to other settings
- Develop effective and appropriate communication systems with parents and carers, ensuring clarity of expectations and procedures, providing guidance, advice, and support for all staff
- Meet the local academy committee / link governor for safeguarding on a regular basis to ensure that safeguarding practices in the academy are always of the highest quality

8.4 Strategic Development Lead

The day-to-day leadership and strategic direction of Trust-wide safeguarding is delegated to the Strategic Development Lead for Safeguarding, who will work with principals and DSLs to ensure that all statutory duties are fulfilled.

The Trust lead must:

- Develop and maintain the most up to date knowledge of the best safeguarding practice, providing expert advice to leaders and ensuring all procedures comply with statutory requirements both at a Trust and local academy level
- Promote and work proactively and in consultation with leaders to develop a culture of the highest standards of safeguarding, ensuring mechanisms to share and build on best practice
- Provide accurate and high-quality advice, guidance and support regarding complex cases and safeguarding concerns, including where these relate to allegations against staff
- Maintain an overview of safeguarding provision across the Trust, ensuring local arrangements are robust so that policy is implemented to a high standard in all academies
- Devise, implement, evaluate, and sustain robust plans for further improvement based on learning and review
- Provide accurate, timely and high-quality reports and feedback to Chief Education Officers, executive leaders, and principals contributing to committee and board meetings liaising with the designated safeguarding trustee, thus enabling the Trust board to discharge its safeguarding responsibilities

8.5 Trustees and Governors (Local academy committee)

The Diverse Academies Trust has identified a Trustee to take leadership responsibility for the Trust's safeguarding arrangements.

The Trustee's role is to provide appropriate challenge and support to the executive leads and the Strategic Development Lead for Safeguarding to ensure that they are satisfied that the Trust is fulfilling its safeguarding duties identified in the statutory guidance 'KCSIE'.

The Trust Board and Local Academy Committees have a duty to:

- Understand the requirements of the Governance Handbook and KCSIE
- Support and challenge the Strategic Development Lead, the academy DSL and Principal on the standards of safeguarding in the Trust / at academy level
- Safeguard and promote the welfare of children
- Have regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Ensure the suitability of staff, supply staff, volunteers, contractors, and proprietors

Trustees will receive appropriate annual safeguarding and child protection training. Safeguarding is captured within governing body and Trust board reports.

9 Additionally vulnerable children

Some children are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination, and prejudice. To ensure that all our pupils receive appropriate protection, we give special consideration to children who:

- Are vulnerable because of their race, ethnicity, religion, disability, gender identity or sexuality
- Are vulnerable to being bullied or are engaging in bullying
- Are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism
- Live in chaotic or unsupportive home situations
- Are Young Carers
- Live transient lifestyles or live away from home or in temporary accommodation
- Are affected by parental substance abuse, domestic violence or parental mental health needs
- Do not have English as a first language

9.1 Children with special educational needs and disabilities (SEND)

We recognise that pupils with SEND, including those with physical and mental health conditions, face additional challenges in keeping safe, and that they may be subject to increased risk by virtue of their special need or disability. Their physical and emotional needs, behaviour, mood, difficulties with communication, increased likelihood of isolation and to bullying all make them more susceptible to abuse, and more vulnerable to abuse being overlooked or ascribed to a different cause.

Our staff working with pupils with SEND who are non-verbal or have limited communication will be particularly vigilant of potential signs of abuse, such as changes in mood and behaviour, suspicious marks, etc, and will promptly respond to these signs by following the Trust safeguarding procedures.

Our staff, particularly those in our special academies, who work in *any* capacity with children with profound and multiple disabilities, sensory impairment and/or emotional and behaviour problems will be particularly sensitive to identifying signs of abuse.

Staff will be aware that [children with disabilities and learning difficulties are particularly vulnerable to abuse](#) because:

- They may not be able to articulate their worries
- They may not recognise that what is happening is inappropriate
- They are dependent on individuals for intimate care

We ensure that pupils with SEND receive appropriate pastoral provision, which, if necessary, may be additional to that provided to non-SEND pupils, and that they are taught in a way that is appropriate to their developmental stage about keeping safe and about sharing any worries or concerns with a trusted adult.

The use of 'reasonable force', referring to use of physical contact to control or restrain a pupil, is sanctioned in our academies when it is being used to safeguard. The additional vulnerabilities of pupils with SEND in the use of reasonable force is known and understood, and we are committed to reducing the risk posed to these pupils and limiting the need for use of reasonable force through a commitment to appropriate training, developing our pastoral support and ensuring our behaviour management systems are fit for purpose.

From time to time, pupils with SEND may need to receive additional support, or part-time/full-time education, from an alternative provider so that their needs can best be met. We will take responsibility for assuring ourselves that the policies and procedures for keeping children safe at all Alternative Provision settings, including those relating to safeguarding and to safer recruitment, are sufficiently robust and are in line with statutory expectations.

Our designated safeguarding staff will ensure that full recording through My Concern continues in those cases where wider special educational needs and a graduated responses through the SEND provision are relevant to both meeting the child's needs and tracking the disclosure.

Please see the Trust's SEND/Inclusion and behaviour policies for further information.

9.2 Lesbian, gay, bisexual, gender questioning, intersex, a-sexual + pupils

We recognise that children identifying as LGBTQIA+ is not in itself a risk factor for harm. However, LGBTQIA+ children, or children perceived to be LGBTQIA+, can be the target for bullying and abuse by their peers, the risks of which can be compounded if they do not have a trusted adult with whom to share these concerns.

We are clear that terms such as 'transphobia' and 'homophobia' are a misrepresentation of the word phobia. More correctly such expressions are discriminatory and may be dealt with as incidents of hate.

Each academy has a trusted adult / point of contact for LGBTQ pupils. They can provide advice and signpost the child to external sources of support.

In addition to meeting their safeguarding needs through the usual disclosure and response processes, staff will provide a safe space for LGBTQIA+ children to discuss concerns and remove any additional barriers that may prevent this. In line with our Relationships, Health and Sex Education policy, pupils will be taught at an age-appropriate point about LGBTQIA+ relationships. When appropriate, and in line with proposed new guidance, all issues and communications regarding gender questioning children, will ideally involve parents. The exception to this will be if disclosure might lead to harm to the child.

9.3 Children who are absent from education

We recognise that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign. We respond to persistently (and severely) absent pupils and children missing education, through support, as outlined in the 2024 update to [‘Working together to improve school attendance \(WTTISA\)’](#).

Our academies take a range of actions to tackle persistent absentees and complete official reports on children who are persistently absent from school. Further details are available in the Trust Attendance policy, which adheres to the revised guidance issued in [WTTISA 2024](#).

No pupil will be removed from an academy roll until all safeguarding checks have been completed or the whereabouts of a pupil have been established, and the removal from roll has been authorised by the local authority.

Appropriate safeguarding arrangements are in place to respond to children who *are absent* from education, particularly on repeat occasions *and/or for prolonged periods*. Where the absences are unauthorised by the academy, this may also lead to formal intervention, early help and / or enforcement.

All staff are aware that children who are regularly or persistently missing from education, may be indicative of a range of wider safeguarding concerns.

This may include:

- Abuse and neglect, which may include sexual abuse or exploitation
- Child criminal exploitation including involvement in county lines
- Mental health problems
- The risk of substance abuse
- The risk of travelling to conflict zones
- Being subjected to female genital mutilation

- The risk of forced marriage

Our designated staff understand that Early Intervention, either through in-school support or a referral to Early Help (EHAF) may be necessary to identify the existence of any underlying safeguarding risk and to prevent the risk of a child going missing in future.

9.4 Elective home education

We are alert to the possible risks posed to children if they are removed from an academy roll by their parents to be educated at home. This is especially so if they are already vulnerable, have a social worker, or have SEND. When applicable, our designated staff will escalate concerns through the respective local authority.

Where a child has an EHCP, we expect the Local Authority will work with parents and colleagues to review the plan, ensuring that due consideration has been given by all to meeting the best interests of the child.

We will follow KCSIE, the [DfE guidance](#) and the [local authority procedures](#) at all times.

9.5 Looked After Children and those in Private Fostering

All our staff will have an awareness of issues around safeguarding looked after (CLA) and previously looked after children (PLAC).

Looked after and previously looked after children are safeguarded, and their academic and wider pastoral needs met by our academies, in accordance with the statutory guidance: [The designated teacher for looked-after and previously looked after children – Feb 2018](#).

Designated staff will understand the specific safeguarding duty around CLA and PLAC.

The respective academy leadership team will ensure that an appropriate, designated member of teaching staff has the skills, knowledge, and understanding necessary to keep looked after children safe. This designated person will be named on the academy website.

Designated staff will be aware of the legal status of a looked after child's care arrangements. They will ensure that appropriate staff have the information they need in relation to a pupil's looked after legal status, the pupil's care arrangements and the levels of authority delegated to the carer by the authority looking after them.

The academy's Designated Teacher for CLA will work with the 'Virtual School' to monitor the child's welfare and discuss how funding can be best used to support the progress of the child and meet the needs identified in the pupil's personal education plan.

The Designated Safeguarding Lead will have details of the pupil's social worker and the name of the 'virtual school' contact in the authority that looks after the pupil.

We expect the local authority to adhere to the guidance as laid out in '[Promoting the Education of children with a social worker, March 2024](#)' and in [Children Act 1989](#).

We recognise the new responsibilities for virtual school heads give them a strategic leadership role to champion the educational attendance, attainment, and progress of children with a social worker. This means that our designated staff expect to work with the VSH:

- making visible the disadvantages that children with a social worker can experience, enhancing partnerships between education settings and local authorities, including with children's social care, to help all agencies hold high aspirations for these children
- promoting practice that supports children's engagement in education, recognising that attending an education setting is an important factor in helping to keep children safe from harm
- levelling up children's outcomes to narrow the attainment gap so every child has the opportunity to reach their potential – including helping to ensure that children with a social worker benefit from support to recover educationally from the impact of the pandemic

Our designated staff:

- work directly with individual children and their families - including tracking and monitoring of individual educational progress, providing academic or other interventions
- respond to requests from parents or carers to offer advice, intervention and support in relation to individual children with a social worker
- take responsibility for children with SEND who do not require or need a social worker, as defined above

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services of the arrangement as soon as possible.

Where such an arrangement is between direct family (grandparents, older (adult) sister / brother and close relatives (such as a uncle or aunt), this is referred to as [Kinship Care](#).

Where a member of staff becomes aware that a pupil may be in a private fostering or kinship care arrangement, they will tell the DSL and the academy will notify the local authority of the circumstances.

All CLA, PLAC, privately fostered and those in kinship care arrangements on roll are identified on the academy safeguarding recording system.

9.6 Children with family members in prison / children in the court system

We recognise the significant impact that a parent being in prison can have on a child's outcomes - academically, emotionally, and financially.

We also recognise that children can be required to give evidence in court, either as victims or as witnesses, and that this is an experience likely to have a significant impact on them.

Both above issues require bespoke support to ensure that the impact on the child's wellbeing is minimised. We will seek appropriate professional support for any of our pupils who are in these circumstances and ensure that pastoral provision actively supports and monitors their progress.

9.7 Children displaying or diagnosed with mental health conditions

In response to the emphasis placed on mental health in KCSIE, we adopt clear systems and processes in place for identifying and supporting mental health issues, including routes to escalate and ensure accountability. These are reviewed to further improve the level of provision.

We understand that mental health problems can be an indicator that a child has suffered, or is at risk of suffering, abuse, and neglect.

In seeing pupils on a day-to-day basis, our staff are well placed to observe their behaviours and to identify any concerns relating to a pupil's mental health.

Where a staff member has a concern about a pupil's mental health who also reflects a safeguarding concern, this will be reported and responded to in line with our safeguarding protocols outlined in the Trust [Mental Health & Wellbeing Principles](#) and in accordance with KCSIE.

The Designated Safeguarding Lead, their deputy, or a suitable alternative staff member, will be a proactive instigator of and/or contributor to any assessment of a pupil's mental health, and will work in collaboration with other agencies, as required, to best meet the pupil's needs.

9.8 Contextual safeguarding threats

Sometimes referred to as extra-familial or community safeguarding threats, we recognise that children are subject to possible risk in their local community. To effectively safeguard our pupils and promote their welfare, we need to understand any specific issues, threats, or additional socio-economic pressures in the local area, which may impact on children's well-being.

We are proactive in working with local partners, including Social Care and the Police, to ensure we stay alert, and respond, to any emerging risks. Any assessment of risk for any of our pupils will include appropriate reference to the local community context and environment.

We recognise that contextual safeguarding can also include threats from:

- Radicalisation and extremism
- Serious violent crime, gangs, and youth violence
- Child Criminal Exploitation (including Modern Slavery, Human Trafficking)
- Child Sexual Exploitation.

9.9 Serious violence

All staff are made aware of indicators that could suggest that children are at risk from, or are involved with, serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by, or are involved with, individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery.

We acknowledge the advice outlined in the [published guidance from the YEF \(Youth Endowment Fund\)](#). We will take into account the five evidence-based recommendations to help our staff prevent children's involvement in violence.

We will work to:

Keep children in education, provide them with trusted adults, develop social and emotional skills, target efforts at places and times where violence occurs and consider strategies such as trauma informed approaches and knife education programmes.

9.10 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can take place in person and / or it can take place online.

Child Criminal Exploitation (CCE)

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, being forced or manipulated into committing vehicle crime, or threatening/committing serious violence to others.

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE indicators can include children who:

- Appear with unexplained gifts or new possessions
- Associate with other young people involved in exploitation
- Suffer from changes in emotional well-being
- Misuse drugs or alcohol
- Go missing for periods of time or regularly return home late
- Regularly miss school or education or do not take part in education

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex), or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or to watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The above CCE indicators can also be indicators of CSE, as can children who:

- Have older boyfriends or girlfriends.
- Contract sexually transmitted infections or become pregnant.

We include the risks of criminal and sexual exploitation in our Relationships, Sex and Health Education (RSHE) curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.

All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns must be reported immediately to the DSL. Staff must always act on any concerns that a child is subject to or is at risk of criminal or sexual exploitation.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store, and sell drugs or move or store money, with offenders often using coercion, intimidation, violence, and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child.

Children can be targeted and recruited into county lines in many locations, including schools and colleges. Indicators of county lines include missing episodes from home and/or school.

Additional specific indicators that may be present where a child is criminally exploited include children who:

- Go missing and are subsequently found in areas away from home
- Have been the victim or perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

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

All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

9.11 Children who are young carers

We acknowledge that young carers may need extra support to ensure they have equal access to education and positive sense of wellbeing.

We recognise that young carers (both those identified and those who may unofficially be caring) are particularly vulnerable to higher absence and adverse mental health. Our staff understand that young carers are now a discreet group reported on via census capture and outcomes.

Through proactive pastoral support and effective safeguarding, we will:

- address any underlying inequalities between young carers and other pupils
- raise awareness of young carers among staff and to ensure the identification of all young carers as early as possible on entry to the academy
- ensure that young carers feel as included and supported within their academy community as possible
- foster respect and understanding towards young carers among all pupils
- ensure that young carers take as full a part as possible in all activities
- ensure that young carers are involved in discussions and decisions affecting young carer provision
- ensure there is a designated professional for young carers who will liaise with relevant colleagues and other relevant agencies regarding their caring responsibilities, with the consent of the young carer
- add the pupil to the vulnerable pupils' list and ensure they receive access to HAF (holiday and food funding) where appropriate
- recognise that flexibility may be needed when responding to the needs of young carers
- monitor the attendance of young carers and respond accordingly with appropriate intervention where necessary

- ensure that, where necessary, young carers have access to the mental health support available

10 Safeguarding procedures (including child-on-child abuse).

Our Trust has a clear procedure for responding to, recording, and reporting all safeguarding concerns. All records are held in our online system and stored securely with permissions-based access. This will be explained to all staff and volunteers on induction, with regular training and refresher sessions to ensure record keeping is of the highest quality.

10.1 Reporting procedure regarding a child

We report concerns **immediately** to the right person as set out below, so that timely action is taken to safeguard the child, prevent harm and give people time to put the right support in place.

1. **The concern is reported immediately to the respective DSL, or if they are not available a DDSL (designated deputy safeguarding lead) or the principal (this may be the same person).** They will then determine whether the matter should be referred to MASH (Multi Agency Safeguarding Hub), or the police. This will depend on the nature of the disclosure.
2. Non-urgent, observational safeguarding concerns may be reported in the first instance via My Concern (the Trust online reporting software), which should be followed up directly with the DSL.
3. All safeguarding concerns will be recorded in the above system. There are no exceptions.
4. Where concerns arise outside of the school community and environment, as professionals working in education, staff still have a duty of care to all children. These concerns should be reported directly to MASH (multi-agency safeguarding hub).

10.2 When a disclosure is being made.

Staff must:

1. Speak to the child in a quiet place straight away, even if this involves requesting emergency cover – staff must state clearly that they are requesting it for safeguarding purposes
2. Request support from the respective DSL, or if this is not practical will ask someone to alert the DSL immediately
3. Record the evidence given by the child / take notes (and place on My Concern)
4. Listen to the child and take the disclosure seriously
5. *Not* ask leading questions (did she hit you? were you afraid?)

6. *Never* promise confidentiality – make it clear that we have a duty to report the concern to the appropriate person who is best placed to deal with it
7. *Not* add our own assumptions or interpretations
8. Stay with the child until support arrives
9. Be clear how to deal with a disclosure which relates to inappropriate imagery (on-line, on a phone, sexting). They must not view, download, or share the imagery themselves. They must not ask the student to delete it. The disclosure must be reported to the DSL who will make appropriate arrangements for this to be dealt with
10. Record the disclosure and attach any first-hand notes on My Concern
11. *Not* contact anyone else other than the DSL, a Deputy DSL, or the principal about the disclosure (the exception is when contacting the professionals listed below if making the report themselves). Our staff must **not** disclose to parent/carers. The DSL, Deputy DSL or principal will make these arrangements as appropriate.
12. Report through to the DSL wherever possible.

10.3 Recording (My Concern)

As stated above, all safeguarding, child protection and welfare concerns are **only** recorded and kept on My Concern. Through bespoke training and quality assurance processes we endeavour to ensure that all records are of high quality.

Records **will** include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Further notes and minutes from meetings where applicable

Local academies will keep accurate levels of need, local flags, consistent categorisation of disclosures, referrals, escalation records and associated file attachments relevant to the child's safeguarding profile.

Safeguarding is a standing agenda item at Trust principal's meetings, local academy SLT meetings and Local Academy Committee meetings, so that processes and cases can be frequently reviewed and responded to. My Concern trends and emerging threats at academy level will be used to shape the direction of mental health provision, PD (personal development) and RSHE programmes.

10.4 Escalation

Any disagreements between the referrer and a professional or agency will be appropriately voiced and discussed, with the referrer following appropriate escalation procedures if they remain dissatisfied and if the circumstances warrant, in line with the local authority [Inter-agency Safeguarding Children Procedures](#).

Any disagreements or escalation will be recorded in writing by the referrer and logged on My Concern.

10.5 Early help

We recognise that early intervention when a child or family is starting to show signs of concern can be critical to ensure that the right help and support is sourced, preventing any further escalation of issues or a decline in the child's safety and wellbeing.

We recognise that partnerships with parents and carers are crucial in identifying the need for early help and for effective collaboration to improve the life chances of pupils. We work proactively with parents and carers to develop effective relationships between home and the academy, and to promote the benefits of early help and intervention to support their child.

Any child can benefit from early help, but we are particularly alert to the needs of:

- SEND pupils, including those with physical and/or mental health needs
- Young carers
- Pupils vulnerable to anti-social behaviour, gangs, abuse, exploitation, and radicalisation
- Pupils currently in or recently returned from care or those being privately fostered
- Pupils misusing drugs or alcohol or living in households where drugs or alcohol are being misused
- Pupils living in households with domestic violence or parental mental health concerns
- Pupils who are severely persistently absent (above 50%) and unauthorised or where absence is persistent (above 10%) and unauthorised

In a case where a concern about a pupil does not suggest a risk of significant harm but they remain in need of additional support, the Designated Safeguarding Lead or their deputy will liaise with parents and, with their permission, follow local Early Help Assessment guidelines to source the most appropriate support.

The Designated Safeguarding Lead or their deputy will be a proactive instigator of, and/or contributor to any Early Help Assessment and subsequent Team Around the Family meeting and,

as above, will lead or attend professionals' meetings where requested, providing appropriate written and/or verbal education and welfare reports related to the pupil and their family as requested by agencies.

10.6 Child-on-child abuse

Child-on-child abuse – all instances of children harming other children is unacceptable and will be taken seriously. Across our academies, it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Allegations will be dealt with in the same manner, regardless of the sex or gender of the victim and perpetrator. We recognise that there are occasions where the perpetrators and victims can be the same sex / gender.

All staff should be clear about the academy's policy and procedures for addressing child-on child abuse and maintain an attitude of 'it could happen here'.

All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

10.6.1 Different types of Child-on-child abuse

- Physical abuse such as shaking, hitting, biting, kicking or hair pulling
- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Sexual violence and harassment such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks, or jokes
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Up skirting, which involves taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress, or alarm
- [Consensual and non-consensual sharing of nude and semi-nude images](#) and/or videos (also known as sexting or youth produced sexual imagery) including pressuring others to share sexual content
- Abuse in intimate personal relationships between peers (also known as teenage relationship abuse) - such as a pattern of actual or threatened acts of physical, sexual, or emotional abuse
- Initiation/hazing – used to induct newcomers into sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

10.6.2 Minimising risk:

We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries
- Using assemblies to outline acceptable and unacceptable behaviour
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs, and other suitable activities
- Ensuring that the academy is well supervised, especially in areas where children might be vulnerable

10.6.3 Investigating allegations:

Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of KCSIE.

All allegations of child-on-child abuse will be immediately passed to the DSL (or in the absence of the DSL, a deputy DSL) who will investigate and manage the allegation as follows:

- **Gather information** – children and staff will be spoken with immediately to gather relevant information
- **Decide on action** – if it is believed that any child is at risk of significant harm, a referral will be made to children's social care (CSC). The DSL will then work with CSC to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this policy
- **Inform parents** – we will usually discuss concerns with parents. However, our focus is always the safety and wellbeing of the child, and so if the academy believes that notifying the parents could increase the risk to a child or exacerbate the problem, advice will first be sought from CSC and / or the police before parents are contacted
- **Record** – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded, kept confidential and stored securely ONLY in My Concern, as part of the child's child protection file. The record will include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, a note of the specific actions taken, the decision that has been reached and the outcome.

Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member must pass on the allegation to the DSL in accordance with this policy. To ensure

children can report their concerns easily, the academy has the following system in place for children to confidently report abuse:

- Supporting those involved. Our staff will reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report
- Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation
- The support required for the pupil who has been harmed will depend on their particular circumstance and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work
- Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.
- If a child experiences child-on-child sexual abuse or there are concerns a child might be displaying harmful sexual behaviour (HSB), the academy Designated Safeguarding Lead is informed, and they need to take child protection action.

10.6.4 Reporting:

Staff must **follow our child protection procedures** by sharing concerns with their designated safeguarding (child protection) lead.

If any of our staff think a child is in immediate danger, they must contact the police on **999**. Any concern about a child (not in immediate danger), is shared with the DSL or DDSL.

The DSL will then:

Report to the police as appropriate (for example, if an allegation of rape, sexual assault or sexual offence is made). This should happen alongside a making a referral to children's social care, following local authority guidelines.

- **Contact the local authority child protection services.**

In all cases the academy will:

- Protect all the children involved, balancing the duty to safeguard the child who has experienced abuse with the need to support the child who has displayed harmful sexual behaviour
- Be mindful of the children who may have witnessed the abuse or are friends of those involved, as they may also be affected and need support

In each case the DSL (or Deputy) will be responsible for gathering all the facts, assessing any risks, and making decisions on a case-by-case basis. The DSL will decide on who needs to be involved to make sure all children are appropriately protected and supported.

It will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions taken by the academy do not jeopardise any police investigation.

The DSL may refer to advice via the following NSPCC link:

<https://learning.nspcc.org.uk/safeguarding-child-protection/managing-allegations-made-against-a-child>

10.6.5 Supporting the child who has experienced abuse:

Every child who has experienced abuse will receive tailored support to meet their needs. Our safeguarding staff will do the following to help make children feel safe and supported:

- Listen carefully to the child and reassure them that you are taking them seriously
- Record the incident, noting all the relevant facts as fully as possible. Write down the language used by the child. This will help you record precisely what happened and understand how the child has been affected
- Consider what support the child may need in the short-term, for example mitigating the risk (as far as possible) of contact with the child who has displayed abusive behaviour
- Consider what long-term support the child may need to help them recover from the trauma of what they have experienced. This may include therapeutic or counselling support
- Understand the child's support network and consider what help they need to protect and care for the child
- Include the child (and parents if applicable) in any decisions that affect them, including (when appropriate) the use of a risk assessment, as outlined in the staff safeguarding operational handbook

10.6.6 Supporting a child who displays abusive or harmful sexual behaviour:

It is important to protect and support children who have displayed abusive or harmful sexual behaviour. Our safeguarding staff will:

- Consider any risks to the child's safety and what multi-agency responses are needed to support the child and their family
- Talk calmly to the child. Remember that they may not realise they have behaved abusively and avoid using language that may make them feel judged or criminalised
- Consider appropriate sanctions referring to the Diverse Academies Behaviour Policy
- Work with the child and their support network to put measures in place that will help the child change their behaviour
- Consider what targeted therapeutic or counselling support the child may need
- Consider and document decision making around the use of a HSB risk assessment to protect both parties, as outlined in the staff safeguarding operational handbook
- Review the risk assessment on a half termly basis, and communicate with parents at each interval.

10.6.7 Multi-agency responses:

The academy DSL should work with relevant agencies to protect and support all the children involved in an incident of child-on-child sexual abuse. This includes children's social care and the police if necessary.

It is the expectation that the academy safeguarding response will consider the [Local Authority](#) and / or [NSPCC 'responding to children who display sexual behaviour'](#) to assess the degree of harmfulness and to develop a coordinated, evidence-based multi-agency response to HSB.

In accordance with the NSCP (Nottinghamshire Safeguarding Children Partnership) advice, our DSL's only use the Brook system if they have attended training delivered by them.

10.6.8 Curriculum opportunities to teach respectful relationships:

As stated earlier in this policy; Diverse Academies has a zero-tolerance approach to abuse, and it will never be passed off as "banter," "just having a laugh," "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Our teaching of safeguarding themes, including child-on-child abuse recognises that even if there are no reported cases, such abuse may still be taking place and is simply not being reported.

We recognise that it is more likely that girls will be victims, but that all child-on-child abuse is unacceptable and will be taken seriously.

We will ensure that as part of the wider personal development programme, children are taught about safeguarding. This may include covering relevant topics through learning in general but is covered particularly in Relationships and Sex Education alongside a detailed PSHE programme.

‘Relationships education’ is taught to children across all phases. ‘Sex education’ (other than that taught within the science syllabus) is mandatory at secondary, with parents having the right to opt their child out up to the age of 15.

We are committed to exposing children to age-appropriate and challenging themes in safeguarding via the use of guest speakers and outside agencies.

Further information is found in the [RSE Policy](#).

For individual academy curriculum coverage around these themes please view or request the respective academy RSE coverage.

11 Female genital mutilation

Where the concern is specifically about FGM (female genital mutilation) - this is illegal, and the concern or suspicion **MUST** be reported to the police immediately. If the DSL is not available, our staff will make the call themselves. This includes where concerns emerge outside of school in the community, through social media or social events.

12 Interviewing and/or searching a child

We follow the guidance on the requirement for children to have an appropriate adult when in contact with police officers who suspect them of an offence, and in the event of them being cautioned, in accordance with the [PACE Code C](#) guidance.

School staff may support the more formal interview process, and some parents may request this support from trusted teachers or leaders they have formed a professional relationship with over several years.

In all cases, the police are responsible for ensuring that the pupil knows they must have someone present, and for facilitating this.

An appropriate adult may be:

1. The parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation
2. A social worker of a local authority
3. A designated member of the academy safeguarding team (DSL/ DDSL/ principal)
4. Another responsible adult aged 18 or over **who is not**:
 - a police officer
 - employed by the police
 - under the direction or control of the chief officer of a police force
 - a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

In the event of a child needing to be interviewed and / or intimately searched we will communicate any vulnerabilities known by the academy to the police officer who wishes to speak to a pupil about an offence they may be investigating.

Any such communication will be recorded on My Concern.

If having been informed of the vulnerabilities of the child, we do not feel the officer has acted in accordance with PACE we will escalate our concerns. The designated member of staff (usually the principal or DSL) will speak to a supervisor or contact the police via the 101 service.

We understand that a police officer *must not* caution a child unless an appropriate adult is present. If a child or vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

13 Safer recruitment

This section should be read in conjunction with the Trust safer recruitment policy.

We follow recruitment procedures that help to deter, reject, or identify people who might harm children. When doing so we check and verify the applicant's identity, qualifications, and work history in accordance with KCSIE part 3 and the local safeguarding partner arrangements.

All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and request DBS (Disclosure and Barring Service) checks where required by KCSIE. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that the staff they provide has been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

We will undertake reasonable online searches, as part of the due diligence, on the successful candidate prior to appointment, following part 3 of KCSIE. Where we identify any incidents or issues that have happened and are publicly available online, these will be discussed with the candidate at interview.

Information will be viewed and gathered by an HR officer, separate from the recruitment panel. Any information of concern will be shared with the panel for their consideration, who will review and decide how to proceed. If there is sufficient concern that there is an immediate unsuitability to work with children and/or as part of our organisation, the recruitment process will be terminated and relevant referrals considered, in line with the policy on managing allegations and safeguarding concerns about adults.

All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks has taken place.

We ensure that all new staff are given an induction programme – which incorporates their safeguarding training.

The Trust maintains a record of pre-appointment checks carried out in each academy within the MAT. These are held in the Single Central Record (SCR). This also includes members and trustees of the Trust Board.

14 Staff and governor/trustee training

All adults across our Trust receive annual safeguarding update briefings at the start of each academic year.

In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils.

Staff and volunteers receive a briefing during their induction which covers:

- An introduction to our Child Protection and Safeguarding policy, and our staff behaviour policy
- How to report and record concerns
- Information about our Designated Safeguarding Leaders and deputy DSLs
- Online safety including monitoring and filtering

Our governors/trustees receive appropriate safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge and to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

Our safeguarding governor/trustees receive additional update training and briefings to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high-quality safeguarding across the trust.

All our staff, governors and volunteers will complete accredited online safeguarding and child protection training as part of their induction. Where applicable to role, training will be given on the use of My Concern and personal log-in details will be made available.

All adults complete the statutory safeguarding training, and this is monitored at a Trust and local level. Modules must be completed for all new employees prior to starting with the Trust and thereafter refreshed every two years.

The statutory safeguarding modules are:

- Certificate in Safeguarding for all staff
- Prevent Duty
- Understanding Female Genital Mutilation

In addition, staff *may* complete the following additional modules:

- Certificate in Sexual Harassment and Violence – priority module
- Certificate in Child Criminal and Sexual Exploitation
- Certificate in Understanding Mental Health
- Certificate in Online Safety

Best practice and reviews are shared through the Trust network for DSLs, and through senior leader meetings.

Governors and Trustees are provided with regular training with meetings for link safeguarding governors. The trustee for Safeguarding liaises closely with the Strategic Lead for Safeguarding,

working closely with Chief Education Officers for the Trust to provide key information and reports to the Trust board.

15 Safeguarding whistleblowing and allegations

This section must be read in conjunction with our policy and procedures as set out in our staff [disciplinary policy](#).

Our staff have access to a copy of the Trust [whistleblowing policy](#) – which refers to concerns of a non-safeguarding nature, but its principles of everyone having a responsibility to report a concern, support those of this policy.

This section is designed to work in full accordance with the statutory guidelines set out within Part Four, KCSIE which describe the expected process for managing safeguarding concerns and allegations in detail.

The key principles are summarised below.

The *safeguarding concerns and allegations process* follows the principles as set out in detail in **appendix C of this policy**.

It is important that all staff and volunteers feel able to raise concerns about a colleague's practice.

Referrals of this nature must adhere to the hierarchy of reporting below.

Note: Staff *may* also report their concerns directly to children's social care or the police if, in the specific circumstances, they believe direct reporting is necessary to secure timely action. In such circumstances, it is the expectation that this response will be communicated to the DSL and principal as soon as practicable.

Who is of concern	Report to and acted upon by...
Any member of staff employed by, or working in a voluntary capacity (including governors) with, the trust	DSL and Principal
DSL	Principal
Principal	Executive Principal
Executive Principal/Executive Leader	Chief Education Officers/Chief Operating Officer
Chief Education Officers/Chief Operating Officer	Chief Executive Officer
Chief Executive Officer	Designated Trustee for Safeguarding.

**if the allegation /disclosure is about governor or trustee behaviour / conduct outside of the academy setting, the referral should go directly to the Local Authority Designated Officer (LADO) and the Strategic Development Lead informed.*

If the options outlined above in the policy have been explored fully and the concern still isn't being handled effectively and may therefore be placing the child or young person at risk, our staff must continue to escalate their concerns by contacting the Strategic Development Leader, safeguarding or by contacting the NSPCC Whistleblowing Advice Line on 0800 028 0285.

Staff are reminded, that if they feel that their concern/report isn't being taken seriously, or for whatever reason, they don't know who to share their concern with – they must report their concern/allegation directly to the Local Authority Designated Officer (LADO).

Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police by the DSL or principal.

If we receive an allegation relating to an incident that happened when an individual or organisation has used our academy premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities) we always follow our safeguarding procedures. As with any safeguarding allegation of this nature, in the event of a disclosure, we inform the LADO.

15.1 Allegations that meet the harms test (threshold) (KCSIE part 4)

Allegations that meet the harms test (threshold) include concern that someone has:

- Behaved in a way that has harmed a child or may have harmed a child
Committed a criminal offence against or related to a child
- Behaved in a way towards a child or children that poses a risk of harm to the child/ren
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

These will automatically be referred to the LADO and managed via the Trust Disciplinary Policy.

16 Low level concerns

Concerns that do not meet the threshold may still be significant in a wider safeguarding context and involve behaviours or actions that are inconsistent with the staff code of conduct, including outside of work, and behaviours or actions that do not require LADO referral. These are known as Low Level Concerns and must be recorded.

A low-level concern is any concern regarding actions or behaviour – (no matter how small, and even if no more than causing a sense of unease, or a ‘nagging doubt’) - of an adult working in an academy or on behalf of the Trust.

This behaviour may:

- Be inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Not meet the threshold or is otherwise not considered serious enough to consider a referral to the LADO (for advice) or disciplinary action.
- Not meet professional standards or safeguarding expectations and/or.
- Relate to their conduct outside of work, which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

For the purposes of this policy, a low-level concern is defined as a concern relating to behaviour that is inconsistent with our Trust’s expectations but does not meet the threshold for an allegation of abuse, as outlined in KCSIE.

These may include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils
- Giving gifts to individual children

We recognise that, at times, a concern about an adult’s conduct towards a child may not be serious enough to be considered as an allegation, but that it nonetheless indicates a concern. We understand the importance of creating a culture of openness and transparency, where any concern, no matter how small, is shared and dealt with appropriately. Such a culture supports us to identify and address any emerging or inappropriate behaviour at an early stage, minimising the risk of abuse and reinforcing clear professional boundaries. Our staff will be trained to recognise appropriate and potentially inappropriate adult conduct.

16.1 Self-referral

All adults working in our Trust are aware of the need to minimise their own vulnerability in not being alone with children or in situations that could render them vulnerable to poor practice and/or allegations against them.

We expect our staff to recognise any occasion where their own behaviour may be seen as a low-level concern by others, and to make a self-referral accordingly. We encourage and expect an open and transparent safeguarding culture in all our settings.

16.2 Reporting and recording a concern.

Any low-level concerns will be reported without prejudice. Low-level concerns about a member of staff will be reported to the principal without delay.

Everyone in our trust (including contractors, trainees and volunteers), has a responsibility to raise concerns about unacceptable practice or behaviour, to prevent the problem escalating, to protect / reduce risks to others and to avoid becoming implicated themselves.

Our protocol follows statutory guidance from the Department for Education in relation to carrying out duties relating to low-level concerns as outlined in KCSIE:

- Staff members must report a concern via email (writing) / or in person for the attention of the principal, or the designated person, in the absence of the principal
- Upon receipt of a low-level concern, the principal will take timely and proportionate action to discuss and address this with the person concerned to correct the issue at an early stage
- If at any stage the principal assesses that there is a risk of harm to pupils, they will follow the process for reporting a safeguarding concern
- The principal will keep a written record of all low-level concerns using the low-level concern log found in each academy's SCR area. The record is clearly recorded as a low-level concern, to avoid confusion or misunderstanding
- Records of low-level concerns will not be referred to in employer references unless they form part of a substantiated allegation
- The principal, and the respective academy HR manager, will regularly review all low-level concerns received, using the low-level concern monitoring log, to identify any emerging patterns of concerning behaviour related to individual(s) or to identify any weaknesses in academy culture where revision of policy or additional training may be a requirement
- In the principal's absence, the report will be made to the respective executive principal
- If the concern is about the principal, or the person acting as the principal in their absence, this must be reported to the executive principal
- If the low-level concern is concerning a member of the MAT central team, it must be made directly to the CEO

We recognise that the term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the highest threshold ('The Harm Test').

All our staff are clear about expectations over what and when to report regarding concerning problematic or inappropriate behaviour, in *themselves* and others.

Our staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.

This includes.

- Empowering staff to share any low-level safeguarding concerns
- Including making a self-declaration if they suspect they have behaved in a way that may compromise them, for example, conducting a 1-1 with a student behind a closed door
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing responsive, sensitive, and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the academy safeguarding system

We expect that those referrals which do not meet the allegation/harm threshold, are shared responsibly with the subject of the referral, and recorded and dealt with appropriately.

We commit to dealing with all disclosures sensitively, proportionately with a duty of care to also protect those working in or on behalf of our Academies from potential false allegations or misunderstandings.

16.3 Record keeping – low level concerns.

Where the principal has met with a member of staff to discuss a low-level concern and no referral or disciplinary warning has been given, the conversation should be followed up in writing to the staff member, a copy of which will be kept on their staff file and provided to the staff member. This will be retained in line with the Retention of Records policy.

A separate academy log will be kept that will include details of the concern, the context in which the concern arose, and action taken. The record will be kept separately from any staff files and will not include any personal staff details or identifiable information.

The purpose of the log is to record areas of concern to enable the principal to regularly review reasons for concern and so that potential patterns of concerning, problematic or inappropriate behaviour can be identified that may point to wider cultural issues in the academy.

The log will determine what action may need to be taken - such as whole school training or a policy revision.

16.4 References

Only substantiated safeguarding allegations will be referred to in references either where a multi-agency process has resulted in a substantiated outcome, or a formal conduct or capability warning has been issued.

17 Learning lessons from allegations/concerns against staff and adults

We acknowledge that learning lessons from safeguarding cases is a fundamental part of an effective culture of safeguarding.

We commit to engaging in any such learning process. Throughout the process of handling allegations and at the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the academy's procedures to help prevent similar events in the future.

The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. Any learning review should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether the suspension was justified.

Where an internal investigation relating to a safeguarding allegation leads to a disciplinary hearing being held, we will undertake a learning review of the case with the intention of identifying any broader learning points for the Trust or the academy.

In the case of a disciplinary, the chair of the panel should discuss any learning identified during the hearing, that could inform MAT-wide practice, with the strategic development lead (safeguarding) as soon as practicable.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. Where the LADO does not undertake a learning review, the Trust will always consider the facts with the case manager and determine whether any improvements can be made. Where the LADO is involved in a case, they will always be updated on any learning points identified.

17.1 Historic / non-recent allegations against staff and adults

Where an adult makes an allegation to any of our academies about them being abused as a child, the individual will be advised to report the allegation to the police.

Non-recent allegations will be reported to the LADO in line with the local authority's procedures for dealing with historic allegations and our policy.

18 Children staying with host families

The academy may make arrangements for pupils to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the statutory guidance to ensure hosting arrangements are as safe as possible.

We cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where pupils stay with host families abroad, we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our Designated Safeguarding Lead will ensure the arrangements are sufficient to safeguard our pupils and will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

Some overseas pupils may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable.

19 Monitoring and review of policy

The implementation of this policy will be monitored through academy quality assurance and our Trust review processes. This information will be used to ensure that safeguarding practice is of the highest quality and to inform further training and strategic plans.

A **full** review of the policy will be conducted annually in the summer term by the Strategic Development Lead, in consultation with other senior leaders, Designated Safeguarding Leads across the Trust, national safeguarding leaders and guidance.

Appendix A Safeguarding definitions and links

A1.1 Physical abuse

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

Indicators of physical abuse

The following may be indicators of physical abuse:

- Have bruises, bleeding, burns, bites, fractures, or other injuries
- Show signs of pain or discomfort
- Keep arms and legs covered, even in warm weather
- Be concerned about changing for PE or swimming.
- An injury that is not consistent with the account given
- Symptoms of drug or alcohol intoxication or poisoning
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

A1.2 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Inappropriate emotional responses, fantasies
- Self-harm
- Drug or solvent abuse
- Running away
- Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

A1.3 Sexual abuse

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

A1.3.1 Mandatory reporting of child sexual abuse

We follow impending legislation (when it becomes law) which places certain individuals – ‘mandated reporters’ – under a statutory duty to report child sexual abuse where they:

- receive a disclosure of child sexual abuse from a child or perpetrator; or
- witness a child being sexually abused; or
- observe recognised indicators of child sexual abuse

Our staff are designated ‘mandated reporters’ as they fall under the two categories below:

- any person working in regulated activity in relation to children (under the Safeguarding and Vulnerable Groups Act 2006, as amended)
- any person working in a position of trust (as defined by the Sexual Offences Act 2003, as amended)

For the purposes of mandatory reporting, 'child sexual abuse' should be interpreted as any act that would be an offence under the Sexual Offences Act 2003 where the alleged victim is a child under the age of 18. Where the child is aged between 13 and under 16 years old, a report need not be made where the mandated reporter reasonably believes that:

- the relationship between the parties is consensual and not intimidatory, exploitative or coercive; and
- the child has not been harmed and is not at risk of being harmed; and
- there is no material difference in capacity or maturity between the parties engaged in the sexual activity concerned, and there is a difference in age of no more than three years

These exceptions should not, however, apply where the alleged perpetrator is in a position of trust within the meaning of the 2003 Act. Where the child is under the age of 13, a report must always be made.

We recognise that it is likely to be a criminal offence for mandated reporters to fail to report child sexual abuse where they:

- are in receipt of a disclosure of child sexual abuse from a child or perpetrator; or witness a child being sexually abused

Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Aggressive behaviour including sexual harassment or molestation
- Reluctance to undress for PE or swimming
- Anal or vaginal discharge, soreness, or scratching
- Bruises or scratches in the genital area
- Reluctance to go home
- Refusal to communicate

- Depression or withdrawal
- Isolation from peer group
- Eating disorders, for example anorexia nervosa and bulimia
- Self-harm
- Substance abuse
- Acquiring gifts such as money or a mobile phone from new 'friends'.

A1.4 Neglect

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

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

Indicators of neglect

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food
- Frequent tiredness
- Frequently dirty or unkempt
- Poor attendance or often late
- Poor concentration
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones or to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is left at home alone or with inappropriate carers

A2 Other definitions / glossary

Issue	Definition and explanation
Child-on-child sexual violence and sexual harassment	<p>Staff should read Part 5 of KCSIE Sexual Violence and Sexual Harassment (SVSH) Between Children in Schools and Colleges. It contains further detailed information on:</p> <ul style="list-style-type: none"> • What constitutes sexual violence and sexual harassment - linked to serious violence • Important contextual information to be aware of, including what is consent, power imbalances, and developmental stages • Harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves • Related legal responsibilities for schools and colleges • Advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment • More detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding, and supporting both the victim(s) and alleged perpetrator(s) <p>Initiation type violence / rituals and hazing – staff and governors should be aware that hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups, including gangs, sports teams, and school groups.</p>
Links to wider reading and websites	
Further information is available at: https://www.nspcc.org.uk/what-is-child-abuse/	
Links to our training modules:	
https://thenationalcollege.co.uk/hub/view/course/sexual-violence-and-sexual-harassment	

Issue	Definition and explanation
Child Sexual Exploitation	<p>Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:</p> <ul style="list-style-type: none"> a) in exchange for something the victim needs or wants, and/or b) for the financial advantage or increased status of the perpetrator or facilitator. <p>The victim may have been sexually exploited even if the activity appears to be consensual. Child sexual exploitation does not always involve physical contact - it can also occur using technology.</p>
Links to wider reading and websites	
Child Sexual Exploitation & How to Keep Your Child Safe NSPCC	
Links to our training modules	
https://thenationalcollege.co.uk/hub/view/course/sexual-exploitation	

Issue	Definition and explanation
Child Criminal Exploitation	<p>A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.</p> <p>The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.</p> <p>The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.</p>
Links to wider reading and websites	
https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/ https://thenationalcollege.co.uk/hub/view/webinar/sqw-county-lines-guidance-for-school-leaders-to-prevent-criminal-exploitation-of-children-and-vulnerable-adults	
Links to our training modules:	
https://thenationalcollege.co.uk/hub/view/course/essential-cpd-county-lines	

Issue	Definition and explanation
Modern Slavery Human Trafficking	<p>Children who are trafficked into the UK are especially vulnerable and are often living in de-facto private fostering arrangements. Child trafficking is the movement of children for exploitation, including domestic servitude, commercial sexual exploitation and to support benefit claims (see www.ecpat.org.uk for further information).</p> <p>Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women, or men using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.</p>
Links to wider reading and websites:	
www.nottinghamshire.gov.uk/media/1735342/icta-briefing-march-19.pdf https://www.nottinghamshire.gov.uk/media/1735342/icta-briefing-march-19.pdf https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health	
<p>The Trust produces an annual statement outlining our corporate approach to safeguarding individuals in accordance with the relevant legislation.</p>	
Links to our training modules:	
https://thenationalcollege.co.uk/hub/view/course/modern-slavery	

Issue	Definition and explanation
Honour-based Abuse: Forced Marriage (FM) and marriage of minors (under 18s)	<p>This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence.</p> <p>We also recognise the new law on marriage - since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form or coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.</p> <p>Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old originating from Pakistan, India, and Bangladesh (approx. 60% of the cases) together with a percentage of cases of children originating from the Middle East and African countries.</p> <p>A signal of FM is the removal of the pupils from school and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings.</p> <p>Any member of staff with any concerns will report this immediately to the DSL, who will raise the concern with the Local Police Safeguarding Unit by email or phone.</p> <p>Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.</p>
Links to wider reading and websites:	
Staff should be aware of the signs of Forced Marriage	
https://www.gov.uk/government/publications/forced-marriage-resource-pack/forced-marriage-resource-pack	

Issue	Definition and explanation
Honour-based Abuse: Female Genital Mutilation (FGM) and Breast Ironing:	<p>There is a specific legal duty on teachers regarding FGM. If, during their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the police. All staff will recognise this responsibility.</p> <p>As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the academy acts without delay.</p> <p>All teachers have a mandatory responsibility to make themselves aware of the practice and report FGM if they discover it (through disclosure not physical examination) to the police and informing the DSL immediately.</p>
Links to wider reading and websites:	
Staff must be aware of the signs of FGM	
Staff should be aware of the signs of Breast Ironing and be culturally aware to be able to identify girls who are at risk of this practice https://www.safeguardingschools.co.uk/breast-ironing/	
Links to our training modules:	

Issue	Definition and explanation
Prevent Duty and Radicalisation	<p>The Prevent Duty was updated in March 2024.</p> <p>Extremism is defined as:</p> <p><i>“vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.” (HM Government Prevent Strategy).</i></p> <p>Radicalisation is defined in KCSIE 2024 / Prevent Duty as the process by which people come to legitimise support <i>for</i>, or <i>the use of</i> terrorist violence.</p> <p>We are alert to the signs and indicators of a pupil showing signs of radicalisation and of being at risk of being drawn into terrorism and will work with local agencies and the Channel programme as required to safeguard these pupils.</p> <p>We recognise that a broad and balanced curriculum will reduce susceptibility and support pupils in developing resilience to extremist ideology. Therefore, learning opportunities will promote pupils’ spiritual, moral, cultural, mental, and physical development, prepare them for the opportunities, responsibilities, and experiences of life, promote community cohesion and British values, and provide a safe space in which they can understand, discuss, and learn to challenge sensitive topics.</p> <p>Referrals to Prevent and Channel should be conducted by the DSL following the guidance in the link below:</p>
Links to wider reading and websites:	
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf	
https://www.gov.uk/government/case-studies/the-channel-programme	
Links to our training modules:	
<p>Staff must be aware of the signs of radicalisation and have completed updated Prevent training (guidance effective from 31 Dec 2023) at the next opportunity</p> <p>https://thenationalcollege.co.uk/hub/view/course/essential-cpd-prevent-duty</p>	

Issue	Definition and explanation
Online safety and risky online behaviours	<p>Safeguarding risks associated with online activity includes:</p> <ul style="list-style-type: none"> • child sexual abuse • controlling or coercive behaviour • extreme sexual violence • fraud • hate crime

- inciting violence
- illegal immigration and people smuggling
- promoting or facilitating suicide
- promoting self-harm
- revenge porn
- selling illegal drugs or weapons
- sexual exploitation
- terrorism

Some content is not illegal but could be harmful or age-inappropriate for children. Our filtering and monitoring via Watch Guard and SENSO prevents children from accessing it on any Diverse Academies device.

Harmful content includes:

- pornographic content
- online abuse, cyberbullying, or online harassment
- content that does not meet a criminal level, but which promotes or glorifies suicide, self-harm or eating disorders

Diverse Academies will ensure that as part of the wider Personal Development programme, children are taught about Online Safety, and in particular the onset of widespread use of AI in generating fake content. We work closely with NOS (National Online Safety) to ensure that parents, pupils, and staff are fully informed of established and emerging threats. In accordance with KCSIE, we make sure that staff are aware of our filtering and monitoring systems. We endeavour to meet the [Cyber security standards](#) for schools and colleges.

Staff, parents, and pupils who are worried that a child has been / is subject to online sexual abuse are encouraged to use the CEOP safety centre reporting tool.

We adhere to the principles laid out in the Online Safety Act 2023.

Links to wider reading and websites:

<https://bills.parliament.uk/bills/3137/publications>

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/b/>

<https://nationalonlinesafety.com/hub/browse>

<https://www.ceop.police.uk/Safety-Centre/>

[Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(updated March 2024\) - GOV.UK \(www.gov.uk\)](#)

The Trust has an overarching online safety policy with further detail on curriculum, monitoring and filtering and how we meet the [Cyber-security standards..](#)

Academies have a separate local policy covering all aspects of Online Safety in their setting.

Links to our training modules:

<https://thenationalcollege.co.uk/hub/view/course/online-safety>

Issue	Definition and explanation
Domestic Abuse	<p>The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear, or experience the effects of abuse.</p> <p>Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, and emotional abuse.</p> <p>Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.</p> <p>Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.</p> <p>Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child.</p> <p>All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they must report their concerns immediately to the DSL.</p>

Links to wider reading and websites

<https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted>

<https://www.gov.uk/government/publications/domestic-abuse-bill-2020-factsheets/domestic-abuse-bill-2020-overarching-factsheet>

Links to our training modules:

<https://nationalcollege.com/courses/domestic-abuse>

Appendix B Online Safety – including filtering and monitoring.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate filtering (Watch Guard) across all settings and monitoring (SENSO) systems in place across secondary settings to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. These filtering and monitoring systems are reviewed regularly to ensure their effectiveness.

We adhere to the [filtering and monitoring standards](#) in accordance with KCSIE paras 14, 103, 124, 138 and 142.

In addition to this policy, we also communicate what filtering and monitoring systems we use via our Online Safety Policy, so parents and other external stakeholders may understand how we work to keep children safe.

We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

Online safety risks can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation, and extremism
- **Contact:** being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending, and receiving explicit images, sharing other explicit images and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing, or financial scams

All staff are aware of these risk areas and should report any concerns to the DSL.

Sharing nudes and semi-nudes

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's Airdrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and

young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.

The reasons for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner.

Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from another child
- Children and young people digitally manipulate an image of a young person into an existing nude online
- Images created or shared are used to abuse other children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or Childrens Social Care
- In all instances where we suspect a child has received an illegal, harmful image from an adult this will be reported to the police

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 - [UKCIS advice 2020](#) . The academy will have regard to this advice when managing these issues.

For further details on how the Trust ensures Online Safety, and in particular monitoring and filtering, please access the Diverse Academies website policy page.

Appendix C Health and safety and site security (including visitors on site and use of academy premises)

We will ensure that there is a robust, up to date Health and Safety Policy and Procedures to meet the statutory responsibility for the safety of pupils and staff at each of our academies.

For full details refer to the [Health and Safety Policies](#).

We refer to, and take into consideration the non-statutory DfE guidance '[Protective security and site preparedness ' April 2024](#) when reviewing and articulating our site security and lockdown protocols.

Each academy will identify and manage health and safety using **risk assessments**, which are carried out:

- On an annual basis for the school learning spaces and environment in and outdoors
- For all academy trips and educational visits
- For pupils travelling between locations during the academy day
- For all work-based learning on work experience placements
- When a pupil returns to the academy following an exclusion due to risky or violent behaviour
- When there are any changes to the premises or practices
- Following a serious accident in relation to staff and/or pupils
- When there is a high-level risk associated with contact with parents
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage

C1 Visitors, contractors, and external users of academy premises:

In accordance with the [latest guidance from NCC](#), and the information in paras 167 and 377 KCSIE, we expect the following procedures to be followed:

- wherever possible, visits to our academies should be pre-arranged
- all visitors must report to reception first and not enter the academy site via any other entrance
- at reception, all visitors should explain the purpose of their visit and who has invited them.
- formal identification must be produced
- all visitors will be asked to sign in via the electronic recording system which may include a photograph of the visitor being taken
- a visitor's badge must be worn and displayed prominently
- visitors should wait in the reception area until they are met by an appropriate member of staff to be escorted to their destination
- academy reception staff will check the signing in and out' records regularly to monitor compliance with these procedures

- all visitors must be accompanied by a member of staff. Visitors must not be alone with children unless this is a legitimate part of their role, for example, a social worker seeing a child
- for a contractor engaged in regulated activity the academy must assure itself that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks via Letters of Assurance)
- all supply teaching and other agency staff must produce their original DBS on first visit to the academy. The DBS number, date of issue and the date of the check are logged by the academy
- if visitors find they are alone with children, they report to a member of staff or reception. This should be explained to visitors
- on departing the academy site, visitors must leave via reception, sign out of the building, return their visitor badge and be seen to leave the premises
- the principal or Designated Safeguarding Lead (DSL) will monitor compliance with the agreed specified visitor's policy procedures. Should any shortfalls be found, these will be addressed as a matter of urgency, to ensure children and visitors to the academy are kept safe
- follow our safeguarding procedures, reporting to the LADO, in the event of receiving an allegation involving children relating to an incident from an individual or organisation using the academy premises out of hours. Para 377 KCSIE.

C2 Pupils with medical needs

This aspect of wider safeguarding of clinically vulnerable children is covered in the [Supporting pupils with medical conditions policy](#).

C3 Supporting safeguarding in transgender / non-binary changing facilities.

We are mindful of our responsibilities towards trans and non-binary pupils, as set out in the Equality Act 2010. Where our Academies have unisex / gender neutral facilities, all pupils who wish to use them may do so. In respect of pupils identifying as trans-gender or non-binary, the Trust will be sensitive to those pupil's individual needs, whilst also recognising the needs and sensitivities of other pupils.

Any request to use facilities from a pupil, who has confirmed to the respective academy that they have commenced the process of transitioning, (and therefore fall under the protected characteristic of gender-reassignment under the Equality Act 2010), will be carefully considered, including assessing the facilities available at the respective Academy and the interests of *all* pupils.

Our academies *may* apply wider safeguarding considerations when deciding on whether denying or restricting access to *single* sex changing facilities for pupils identifying as transgender / non-binary is put into practice. Placing pupils at this disadvantage *will only be exercised after the local Academy has assessed the safeguarding risk as a proportionate means of achieving a legitimate aim*.

We will always work in conjunction with the latest statutory guidance for schools as published by the DfE (HM Government), and act in accordance with the latest statutory instruction on equality outlined in paragraph 89 KCSIE and the equality act 2010.

We acknowledge that the current [DfE guidance around 'gender questioning children'](#) is non-statutory and so will approach the subject with reference to the content therein, whilst at the same time making a local judgement on the best course of action as cases arise.

C4 Work experience

Our academies have detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with statutory guidance.

Appendix D Confidentiality and sharing information.

Child protection issues necessitate a high level of confidentiality. Staff should only discuss initial concerns with the Designated Safeguarding Lead, principal, or Chair of Governors at their respective academy.

We always adhere to the 'seven golden rules' / principles laid out in the document ['Information Sharing – Advice for practitioners \(May 2024\)'](#).

Sharing information

- The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where it is safe to do so, the DSL may share information *without* consent, and will record the reason for deciding to do so
- We recognise that sharing information with a third party is only done when necessary, proportionate for the intended purpose, is relevant, adequate and accurate
- Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate, and accurate
- Information sharing decisions will be recorded, whether or not the decision is taken to share
- The UK GDPR and the Data Protection Act 2018 do not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a

child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection Officer

Storing information

- Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with our Retention and Destruction Policy.