

# SAFEGUARDING POLICY



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## 1. AIMS

1.1 Within this policy ‘we’ and ‘us’ means the Federation.

1.2 We aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

## 2. LEGISLATION AND STATUTORY GUIDANCE

2.1 This policy is based upon the Department for Education’s statutory guidance on:

- [Keeping Children Safe in Education 2026](#)
- [Working Together to Safeguard Children 2026](#)
- [What to do if you’re worried a child is being abused \(March 2015\)](#) and
- [Academy Trusts - Governance Guide](#)

2.2 We comply with this guidance and the procedures set out by our local safeguarding children board.

2.3 This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students at the Federation.
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#) which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children.

- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and Executive Principal should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our academies to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.
- [Operation Encompass statutory guidance](#), which explains that the police must notify our school of any incidents involving domestic abuse.
- The [Childcare \(Disqualification\) Regulations 2009](#) (and [2018](#) amendment) and [Childcare Act 2006](#), which set out who is disqualified from working with children.

2.4 We are committed to working in partnership with outside agencies to help prevent, protect and support children at risk. This co-operation includes a representative from our safeguarding team attending multi-agency meetings and other inter-agency meetings.

### 3. DEFINITIONS

3.1 Safeguarding and promoting the welfare of children means:

- 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.
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

3.2 We will make all staff aware of the different types of abuse and the warning signs for each:

3.2.1 Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by

others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

- 3.2.2 Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 3.2.3 Emotional abuse: 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, though it may occur alone.
- 3.2.4 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 including pseudo-images that are computer-generated images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, grooming a child in preparation for abuse or upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- 3.2.5 Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
  - protect a child from physical and emotional harm or danger;
  - ensure adequate supervision (including the use of inadequate caregivers);
  - ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 3.2.6 Radicalisation and extremism: extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between

communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

- 3.2.7 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity:
- These are defined as forms of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
  - The imbalance can be due to age, as well as other factors like gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.
  - In some cases, the abuse may involve an exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (e.g., increased status) of the perpetrator or facilitator.
  - It can be perpetrated by individuals or groups, males or females, and children or adults.
  - It can be a one-off occurrence or be a series of incidents over time, and range from opportunistic to complex organised abuse.
  - It can involve force and/or enticement-based methods of compliance and can involve violence or threats of violence.
  - Victims can be exploited even when activity appears to be consensual.
  - It can happen online as well as in person.
- 3.2.8 County Lines: Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes from school or home, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.
- 3.2.9 Children missing from education or are absent: Children absent from education, particularly on repeated occasions and/or prolonged periods, can act as a vital warning sign of a range of safeguarding possibilities. This could include neglect, sexual abuse or exploitation and child criminal exploitation. It may also indicate mental health concerns, risk of substance abuse, risk of travelling to conflict zones, risk of Female Genital Mutilation or risk of forced marriage. Early intervention is essential for keeping these children safe and schools should follow their unauthorised absence procedures when these issues arise.

- 3.2.10 Child on child abuse: Can be defined as any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). This also includes teenage relationships.
- 3.2.11 Mental Health: mental health problems may "develop into safeguarding concerns" including "self-harm, suicidal ideation or risk of suicide." In cases where staff feel a child is in danger, they should contact 999, take the child to A&E, get help from NHS 111 online, or call 111 – depending on the specific circumstances. The following potential warning signs of poor mental health include:
- Significant changes in behaviour
  - Ongoing difficulty sleeping
  - Withdrawing from social situations
  - Not wanting to do things they usually like
  - Physical signs of self-harm or neglecting themselves
- 3.2.12 As part of [Working Together to Safeguard Children 2026](#) we will ensure that: Safeguarding and promoting the welfare of children as defined in this document will:
- provide help and support to meet the needs of children as soon as problems emerge;
  - protect children from maltreatment, whether that is within or outside the home, including online;
  - prevent impairment of children's mental and physical health or development;
  - ensure that children grow up in circumstances consistent with the provision of safe and effective care;
  - promote the upbringing of children with their birth parents, or otherwise their family through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
  - take 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.

## 4. EQUALITY STATEMENT

- 4.1 Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- 4.2 We give special consideration to children who:
- Have special educational needs and/or disabilities or health conditions.
  - Are young carers.
  - May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
  - Have English as an additional language.
  - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
  - Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
  - Are asylum seekers.
  - Are looked after or previously looked after.
  - Are at risk due to either their own or a family member's mental health needs.

- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.
- Are pregnant or parenting children.
- Display early harmful, abusive or violent behaviours.
- Are on reduced or parttime timetables.
- Attend Alternative Provision
- Are frequently missing from home, care or education

## 5. ROLES AND RESPONSIBILITIES

- 5.1 Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors within the Federation and is consistent with the procedures of the Leicestershire and Rutland Safeguarding Childrens Board. Our policy and procedures also apply to extended school and off-site activities.
- 5.2 Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have professional curiosity to explore concerns.

## 6. RESPONSIBILITIES OF ALL STAFF

- 6.1 All staff will read and understand part 1 in full of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education and review this guidance at least annually.
- 6.2 All staff will be aware of:
- Our systems which support safeguarding, including the staff Safer Code of Conduct, the role of the Designated Safeguarding Lead (DSL), the Behaviour Management Policy, the safeguarding response to children who go missing from education.
  - Staff will understand local Family Help arrangements, including community-based Family Help assessments, targeted Family Help support, thresholds for intervention, and escalation to Children's Social Care where required.
  - The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
  - What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
  - The signs and indicators of abuse, neglect and exploitation, including child criminal exploitation, child sexual exploitation, financial exploitation, online exploitation and technology-facilitated abuse.
  - All staff will receive safeguarding training annually and updates will be provided throughout the year. Staff will also receive a separate training session on Prevent. Further information on radicalisation and extremism can be found in the Federation's Prevent Strategy and Risk Assessment.
  - Filtering and monitoring systems within the school and understand their role through appropriate training, policies, processes and procedures. They will know how to act on reports and concerns

- Staff will receive training appropriate to their role on the operation of filtering and monitoring systems and how safeguarding concerns identified through those systems are reported, recorded and escalated.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.

## 7. RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

- 7.1 We will designate a senior staff member, normally a Vice Principal or Head of School, to be the DSL. Our DSLs are currently:
- Catmose Primary: Kelly Jackson [kjackson@catmoseprimary.com](mailto:kjackson@catmoseprimary.com)
  - Catmose College: Claire Pugh [cpugh@catmosecollege.com](mailto:cpugh@catmosecollege.com)
  - Harington School: Natalie Henry-Oliver [nhenry-oliver@haringtonschool.com](mailto:nhenry-oliver@haringtonschool.com)
- 7.2 The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- 7.3 The DSL will be given the time, funding, resources, training and support to:
- Provide advice and support to other staff on child welfare and child protection matters.
  - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
  - Contribute to the assessment of children.
  - Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
  - The DSL will also keep the Head of School/Executive Principal informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- 7.4 The DSL will take responsibility for the filtering and monitoring systems role and ensure that the published filtering and monitoring standards are met.

## 8. RESPONSIBILITIES OF THE GOVERNING BODY

- 8.1 The governing body will approve this policy at each review, and hold the Head of School/Executive Principal to account for its implementation.
- 8.2 We have a nominated governor, currently Emma Gautrey, to monitor the effectiveness of this policy in conjunction with the full governing body. This is always a different person from the DSL.
- 8.3 The governing body should ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- 8.4 The local governing body of each Academy is responsible for the implementation of the Child Protection Policy.
- 8.5 The Chair of the Trust will act as the 'case manager' in the event that an allegation of abuse is made against the Executive Principal, where appropriate.

## 9. RESPONSIBILITIES OF THE EXECUTIVE PRINCIPAL/HEAD OF SCHOOL

9.1 The Executive Principal/Head of School is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
- Communicating this policy to parents when their children join the Federation and via our websites.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting.

## 10. CONFIDENTIALITY

10.1 We are firmly committed to data protection, as outlined in our Data Protection Policy. When dealing with welfare and safeguarding cases, the safeguarding team will adhere to the following:

- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm.
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- The [Data Protection Act \(DPA\) 2018](#) and the UK [GDPR](#) and the [Data \(Use and Access\) Act 2025](#), do not prevent the sharing of information for safeguarding purposes where lawful and proportionate.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- The Government's [Information sharing advice for safeguarding practitioners - GOV.UK](#)
- includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information.

## 11. RECOGNISING ABUSE AND TAKING ACTION

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

11.1.1 If a child is in immediate danger:

- Make a referral to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm. Anyone can make a referral.
- Tell the DSL as soon as possible if you make a referral directly.

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Add the incident on CPOMS and alert to Safeguarding group on CPOMS. If you do not have access to CPOMS your duty is to report this to a member of staff. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.

11.1.3 If you have a concern that a child is carrying a weapon this should be reported to the DSL and SLT immediately.

11.2 If you discover that FGM has taken place or a pupil is at risk of FGM:

- The Department for Education's Keeping Children Safe in Education explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'.
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk.

11.3 Any teacher who discovers that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

11.4 The duty above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. If FGM is suspected, the teacher should follow local safeguarding procedures. Staff should not examine pupils.

11.5 Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

- 11.6 Any member of staff who suspects a pupil is at risk of FGM or discovers that a student age 18 or over appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

## 12. IF YOU HAVE CONCERNS ABOUT A CHILD (AS OPPOSED TO A CHILD BEING IN IMMEDIATE DANGER)

- 12.1 Appendix 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger.
- 12.2 Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).
- 12.3 You can also contact the charity [NSPCC](https://www.nspcc.org.uk) on 0808 800 5000 if you need advice on the appropriate action.

## 13. FAMILY HELP

- 13.1 If Family Help is appropriate, the DSL will support staff in accessing community-based Family Help assessments, targeted Family Help support and multi-agency services. Family Help aims to provide support as soon as difficulties emerge and before statutory intervention becomes necessary.
- 13.2 Any child may benefit from Family Help, but all School and College staff should be particularly alert to the potential need for Family Help for a child who:
- is disabled
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - is a young carer
  - is bereaved
  - is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
  - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - is at risk of being radicalised or exploited
  - is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing drugs or alcohol
  - is suffering from mental ill health
  - is pregnant and/or a parent
  - has displayed early abusive, violent or harmful behaviours
  - has been repeatedly removed from lessons
  - is on a part-time timetable
  - attends Alternative Provision
  - is frequently missing from home, care or education
  - has returned home to their family from care

- is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- is a privately fostered child
- has experienced multiple suspensions, and is at risk of, or has been being permanently excluded
- has a parent or carer in custody, or is affected by parental offending
- is missing education, or persistently absent from school, or not in receipt of full-time education.

The DSL will keep the case under constant review and we will consider a referral to the local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

## 14. REFERRAL

14.1 If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. Children and Young People's Service (CYPS) referrals should be made to the child's county of residence. Referral Team at Rutland County Council - Duty Officer - 01572 758407.

14.2 If you make a referral directly, you must tell the DSL as soon as possible.

14.3 Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- the child is in need and should be assessed under section 17 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process,
- further specialist assessments are required to help the local authority to decide what further action to take.

14.4 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

## 15. IF YOU HAVE CONCERNS ABOUT EXTREMISM

15.1 If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

15.2 Where there is a concern, the DSL will consider the level of risk and seek advice from the local police prevent team.

15.3 You should contact Leicestershire Police Prevent Team on telephone number 101, extension 2541.

15.4 You can also contact the national police Prevent Advice line on 0800 0113764.

15.5 In an emergency, call 999:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist-related.

## 16. CHILDREN WHO ARE GENDER QUESTIONING, LESBIAN, GAY, BI, OR TRANSGENDER (LGBTQ+)

- 16.1 The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. The Federation therefore endeavours to reduce the additional barriers faced, it is important for staff to create a culture where students can speak out or share any concerns with staff.
- 16.2 The Federation will not initiate any action regarding social transition; this guidance applies where a child or their parent has requested that the school make changes, or put support in place in order to facilitate the child presenting as the opposite biological sex ('social transition'). Members of staff should not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents or carers have been involved as set out in KCSIE.
- 16.3 We will make decisions in line with the principles set out in KCSIE and ensure that the decision-making process is documented and records are kept.
- 16.4 We will not allow pupils into toilets, changing rooms, or residential accommodation designated for the opposite sex, with no exceptions. Similarly, where we have implemented single-sex sports as being necessary for safety reasons, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite sex.

## 17. CONCERNS ABOUT A STAFF MEMBER OR VOLUNTEER

- 17.1 If you have concerns about a member of staff, supply teacher or volunteer, speak to the Head of School/Executive Principal. If you have concerns about the Head of School/Executive Principal, speak to the Chair of the Trust.
- 17.2 You can also discuss any concerns about any staff member or volunteer with the DSL.
- 17.3 The Head of School/Executive Principal/Chair of the Trust/DSL will then follow the relevant procedures.
- 17.4 Low-level concerns should be reported to the Executive Principal or Head of School.

## 18. ALLEGATIONS OF ABUSE MADE AGAINST OTHER PUPILS

- 18.1 We recognise that children are capable of abusing their peers. Abuse will never be tolerated. Child-on-child abuse may also include financial exploitation, technology-facilitated abuse, online

coercion and online exploitation. These behaviours will never be dismissed as banter, part of growing up or normal adolescent behaviour.

18.2 Most cases of pupils hurting other pupils will be dealt with under the behaviour policies, but this Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

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

- You must tell the DSL and record the allegation, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS) or the Mental Health School Team (MHST), if appropriate.

18.4 We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring students know they can talk to staff confidentially by assemblies and the tutorial programme.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

## 19. NUDE AND SEMI-NUDE SHARING

19.1 If you are made aware of an incident involving nude or semi-nude sharing, you must report it to the DSL immediately. (This includes AI-generated images, digitally manipulated images, deepfake imagery and artificially generated nude or semi-nude content), these incidents will be treated as safeguarding concerns and managed in accordance with national guidance. You must not:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery, (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves, or other parents or carers.
- Say or do anything to blame or shame any young people involved.

19.2 Following a report of an incident the DSL will review the information with appropriate school staff, this meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed).
- What further information is required to decide on the best response.
- Whether the imagery has been shared widely and via what services and platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the pupil(s) involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of pupils involved (in most cases parents should be involved).

The DSL will make an immediate referral to the police and/or social care:

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

If none of the above apply the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

## 20. MENTAL HEALTH

20.1 All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or, is at risk of suffering abuse, neglect or exploitation.

Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one.

20.2 Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental

health, behaviour and education.

20.3 Staff should act on any mental health concerns that are also safeguarding concerns, following the school's child protection policy and speaking to the DSL or deputy.

## 21. CONTEXTUAL SAFEGUARDING

21.1 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of this environment.

21.2 All staff should consider whether children are at risk of abuse or exploitation in situations outside their families (e.g. sexual exploitation, criminal exploitation, serious youth violence).

## 22. NOTIFYING PARENTS

22.1 Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

22.2 Other staff will only talk to parents about any such concerns following consultation with the DSL.

22.3 If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

22.4 In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## 23. MOBILE PHONES AND CAMERAS

23.1 Each school has its own policy around mobile phones.

23.2 We will follow the Data Protection Act 2018 when taking and storing photos and recordings for use in the Federation. See the Photography Policy for more details.

## 24. USE OF REASONABLE FORCE

24.1 There are circumstances when it is appropriate for staff to use reasonable force to safeguard students. Examples of reasonable force would include guiding a child to safety by the arm, breaking up a fight, or where a young person needs to be restrained to prevent violence or injury. Reasonable force in these circumstances means 'using no more force than is needed'. For guidance, please refer to the Federation Safer Care Code of Conduct Policy.

## 25. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES

25.1 Complaints against staff:

25.1.1 Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff. Please refer to the Federation's Allegations of Abuse Against Staff Policy.

## 25.2 Other complaints:

25.2.1 Complaints of a non-safeguarding nature will be handled using the Federation Complaints Policy.

## 25.3 Whistle-blowing:

25.3.1 We have a separate Whistle-Blowing Policy for employees which covers inappropriate conduct by a staff member, poor or unsafe practice, or potential failures by individuals. If an individual has concerns about the way we safeguard students, they should follow this policy.

## 26. RECORD-KEEPING

26.1 We will keep confidential, accurate and up-to-date records that note concerns about the welfare and behaviour of a student. Records relating to Family Help interventions, exploitation concerns and online safety incidents, including AI-generated image incidents, will be maintained in line with safeguarding requirements and local procedures.

26.2 Safeguarding records are kept by the DSL.

26.3 We will hold records in line with our records retention schedule.

26.4 All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

26.5 Records should include:

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

26.6 Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

26.7 Safeguarding records relating to individual students will be retained for a reasonable period of time after they have left the Federation.

26.8 CPOMS will allow for the recording of all welfare, safeguarding and prevent logs across the Federation.

26.9 Paper safeguarding files are stored securely and only accessed by the safeguarding team and the Assistant to the Executive Principal.

26.10 We share information with other agencies where appropriate. Further information on this is available in our Data Protection Policy and our Privacy Notices for staff and students.

26.11 When a child leaves the Federation, we will ensure their safeguarding and SEN file is transferred within 5 working days of the confirmed start at the new school, ensuring secure transit and confirmation of receipt. If a child moves to another school the DSL will also consider if it is

appropriate to share safeguarding information with the new school in advance of the child leaving.

## 27. TRAINING OF ALL STAFF

- 27.1 All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand our safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be updated annually and will be in line with advice from our local safeguarding children board.
- 27.2 Training will include awareness of Family Help arrangements, A-related safeguarding risks, online exploitation, deepfake imagery, filtering and monitoring systems, and current indicators of abuse, neglect and exploitation.
- 27.3 All staff will have training on the Government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- 27.4 Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- 27.5 Volunteers will receive appropriate training, if applicable.

## 28. TRAINING OF THE DSL AND DEPUTY/DEPUTIES

- 28.1 The DSL and deputies will undertake child protection and safeguarding training at least every two years.
- 28.2 In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- 28.3 They will also undertake Prevent awareness training.

## 29. TRAINING OF GOVERNORS

- 29.1 All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

## 30. RECRUITMENT – INTERVIEW/APPOINTMENT PANELS

- 30.1 At least one person on any interview/appointment panel for a post at the Federation will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education and be in line with local safeguarding procedures.
- 30.2 We adhere to the guidance on safer recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children. This is captured

in the Federation Recruitment Policy. This policy describes in detail those checks that are, or may be, required for any individual working in any capacity at, or visiting, the Federation.

- 30.3 All statutory guidelines for retaining a Single Central Record will be met. Volunteer roles will be assessed in accordance with KCSIE and the Crime and Policing Act 2026. Where volunteers undertake regulated activity, enhanced DBS checks including children's barred list information will be obtained

## 31. CURRICULUM

- 31.1 We will provide a curriculum that aims to raise awareness amongst students about keeping safe and raising self-esteem and the confidence to share their concerns with adults in the Federation. Assemblies, tutorial and ICT lessons will provide students with relevant and up-to-date information about how to stay safe. This will include sessions on:

- Bullying, including cyberbullying (by text message, on social networking sites, and so on) and prejudice-based bullying.
- Sexual abuse and harassment.
- Racism, disability, and homophobic or transphobic abuse.
- Radicalisation and extremist behaviour.
- Child sexual exploitation.
- Relationships, sex and health education (RSHE)
- E-safety such as the safe use of social network sites as well as good practice in using the internet.
- Nude or semi-nude sharing.
- Sexual consent.
- Substance misuse.
- Issues that may be specific to a local area or population, for example gang activity and youth violence and particular issues affecting children including domestic violence, sexual exploitation, female genital mutilation and forced marriage.
- Mental Health support available.

## 32. MONITORING ARRANGEMENTS

- 32.1 This policy will be reviewed annually as part of our annual review or in response to changes in statutory guidance.

## 33. USE OF FEDERATION BUILDINGS BY OUTSIDE AGENCIES

- 33.1 The governing body and Academy should make sure that:

- Any third party that hires/leases a school building has appropriate safeguarding policies and procedures in place (they should inspect these as needed).
- There are arrangements in place to liaise with the DSL where appropriate.
- Any transfer of control agreement (such as a lease or hire agreement):
  - includes safeguarding requirements as a condition of using the school premises;
  - states that the governing body or school will terminate the agreement if they fail to comply with these safeguarding arrangements.

34. APPENDIX 1:  
PROCEDURE IF YOU HAVE CONCERNS ABOUT A CHILD'S WELFARE (NO IMMEDIATE DANGER)

