TRUE LEARNING PARTNERSHIP

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Disley Primary School

Child Protection and Safeguarding Policy

Reviewed by: Governing Body **Approved by: Trust Board**	
Policy Date: September 2026	**Review Date: September 2027** Unless there are operational or legislative changes that require an earlier review.

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Statement of Intent

True Learning Partnership (TLP) is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of our schools' premises. We implement a trust-wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken and that healthy relationships are promoted. The trust is also committed to a zero-tolerance policy with regards to sexual harassment and violence.

This policy has been created to outline a clear framework relating to any aspects of safeguarding within the trust and should be followed by:

- All members of staff.
- Any school within the trust.
- Any local governing boards and committees of the trust.
- Individual trustees and the board of trustees.
- The trust as a whole, including trust staff.
- Any associate members of the board of trustees and/or its committees.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the board of trustees, headteachers and trust and school staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the DSL or deputy DSL (DDSL) within their school.
- Ensuring pupils are taught how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil who has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that headteachers and any new staff and volunteers within the trust are only appointed once all the appropriate checks have been satisfactorily completed.

This policy contains a number of acronyms used in the Education sector. These acronyms are listed in Appendix B alongside their descriptions.

Disley Primary School

Disley Primary School serves the village of Disley and the surrounding communities on the Cheshire East and Derbyshire border. As a primary school, we recognise that children require a safe, nurturing and supportive environment in which they can learn, develop and thrive. We are committed to ensuring that safeguarding is at the heart of everything we do and that every child feels safe, valued and listened to.

The school works closely with Cheshire East Safeguarding Children Partnership (CESCP), Children's Services, health professionals, the police and other partner agencies to understand local safeguarding concerns and provide early support for children and families when needed. We recognise that safeguarding risks continue to evolve and that children may be vulnerable to harm

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both within their immediate environment and through their increasing use of technology and online platforms.

Whilst Disley is generally a safe and supportive community, children and families may still experience a range of safeguarding challenges. Current local and national safeguarding themes include:

- Neglect and the impact of unmet needs on children's development and wellbeing.
- Domestic abuse and the impact of family circumstances on children's emotional health and safety.
- Mental health and emotional wellbeing concerns affecting children and families.
- Online safety risks, including inappropriate content, cyberbullying, online grooming and misuse of social media and gaming platforms.
- Child-on-child abuse, including bullying, prejudice-based incidents and inappropriate behaviours.
- Poor attendance and children becoming vulnerable through reduced engagement with education.
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE), recognising the importance of early awareness and prevention.
- Contextual safeguarding concerns, recognising that risks can arise within the community, peer groups and online environments.
- The impact of poverty, family stress, bereavement and adverse childhood experiences on children's wellbeing and outcomes.

As a school community, we understand that safeguarding is everyone's responsibility. We seek to develop strong partnerships with parents and carers, promote positive relationships and provide children with the knowledge, skills and confidence to keep themselves safe. Through our curriculum, pastoral support and safeguarding procedures, we aim to build resilience, encourage children to speak out when they are worried and ensure that concerns are identified and addressed at the earliest opportunity.

At Disley Primary School the named personnel with designated responsibility for Child Protection and Safeguarding are:

Designated Safeguarding Lead (DSL)	**Deputy Designated Safeguarding Lead/s (DDSL)**	**Safeguarding Governor**
Jake Nicklin	Rebecca Adamson Vicki Proctor	Ian Rush

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The named personnel with designated responsibility regarding allegations against staff / those working in the school are:

Designated Senior Manager	**Chair of Governors (in the event of an allegation against the Headteacher)**
Jake Nicklin	Ian Rush

Additional Responsibilities:

Role	**Name**
Designated Teacher for Cared for Children	**Rebecca Kemp**
Mental Health Lead	**Rebecca Adamson**
Single Point of Contact for Prevent (SPOC) *(usually the DSL)*	**Jake Nicklin**
Single Point of Contact for FGM	**Jake Nicklin**

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026

Statutory guidance

- DfE 'Keeping children safe in education'

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- DfE 'Working Together to Safeguard Children'
- Home Office 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE 'Disqualification under the Childcare Act 2006'
- DfE 'Academy trust handbook 2025'
- HM Government 'Multi-agency statutory guidance on female genital mutilation'
- HM Government 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office 'Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'
- DfE 'Working together to improve school attendance'

Non-statutory guidance

- DfE 'What to do if you're worried a child is being abused'
- DfE 'Information sharing'
- DfE 'Academy trust governance guide'
- DfE 'Child sexual exploitation'
- DfE 'Recruit teachers from overseas'
- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Teachers' Standards'
- DfE 'Meeting digital and technology standards in schools and colleges'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Restrictive interventions, including the use of reasonable force, in schools'
- Department of Health and Social Care 'Virginity testing and hymenoplasty: multi-agency guidance'

Policies and documents

This policy operates in conjunction with the following school-level and trust-wide policies:

- Allegations of Abuse Against Staff Policy
- Anti-bullying Policy
- Behaviour Policy
- Child Sexual Exploitation (CSE)
- Child-on-child Abuse Policy
- Children Missing from Education Policy
- Cyber-security Policy
- Data Protection Policy
- LAC Policy
- Low-level Safeguarding Concerns
- Online Safety Policy
- Safe Use of AI Policy
- Prevent Duty
- Mobile Devices Policy
- Records Management
- Safer Recruitment Policy
- Social, Emotional and Mental Health (SEMH) Policy

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- Staff Code of Conduct
- Staff ICT and Electronic Devices Policy
- Suspension and Exclusion Policy
- Whistleblowing Policy
- Restrictive Intervention Policy

2. Roles and Responsibilities

The board of trustees is responsible for:

- Carrying out their functions to safeguard and promote the welfare of children in all schools within the MAT.
- Understanding their safeguarding duties and having regard to any statutory guidance on safeguarding issued by the Secretary of State.
- Taking strategic leadership responsibility for the trust's safeguarding arrangements.
- Ensuring the suitability of staff, supply staff, volunteers, contractors, and proprietors.
- Making sure that all schools within the trust have effective safeguarding policies, procedures and training in place that comply with their statutory obligations.
- Ensuring that the policies and procedures adopted by local governing boards, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff.
- Having procedures in place to monitor the implementation of safeguarding policies and procedures regularly.
- Ensuring that all governors and trustees receive appropriate safeguarding and child protection training at induction, and that this training is updated regularly thereafter.
- Commissioning independent safeguarding audits of each school and the trust as a whole once per year.
- Receiving regular reports from the CEO on safeguarding to the board of trustees delegating operational responsibilities.
- Ensuring that every school within the trust complies with its duties under the above child protection and safeguarding legislation.
- Facilitating training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the trust's schools.
- Guaranteeing that each school within the trust contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirming that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Understanding the local criteria for action and the local protocol for assessment for each school within the trust and ensuring these are reflected in the trust's policies and procedures.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensuring that staff in schools working directly with children read at least part one of KCSIE.
- Ensuring that staff in schools who do not work directly with children read part one of KCSIE.
- Ensuring that mechanisms are in place to assist staff in schools to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring schools within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.

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- Ensuring schools within the trust appoint one or more DDSLs to provide support to the DSL and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensuring each school within the trust facilitates a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern within a school that is part of the trust, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place within the trust for pupils to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensuring that a member of the local governing board for each school within the trust is nominated to liaise with the school's LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each school's DSL, DDSL(s) and SLT.
- Making sure that pupils in each school are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff within the trust are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensuring each school within the trust has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guaranteeing that volunteers within the trust are appropriately supervised.
- Making sure that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensuring each school within the trust takes overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met.
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guaranteeing that there are procedures in place within the trust to handle pupils' allegations against other pupils.

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- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff within the trust.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Guaranteeing that there are systems in place for pupils to express their views and give feedback within the trust.
- Establishing an early help procedure and ensure all staff within the trust understand the procedure and their role in it.
- Appointing a designated teacher for LAC within each school to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensuring that the designated teacher for LAC within each school works with the virtual school head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introducing mechanisms to assist staff within the trust in understanding and discharging their roles and responsibilities.
- Making sure that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Putting in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensuring the trust has put in place appropriate safeguarding responses for pupils who go missing from a school within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.
- Ensuring that all members of the board of trustees have been subject to an enhanced DBS check.
- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each school and the effectiveness of recordkeeping is monitored.
- Acting in accordance with their obligations under the Human Rights Act 1998 the Equality Act 2010, and the trust's local multi-agency safeguarding arrangements.
- Ensuring each school within the trust has appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks.
- Ensuring each school within the trust has safeguarding requirements that are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.
- Ensuring each school within the trust has robust health and safety and emergency evacuation procedures.

<u>The designated safeguarding trustee is responsible for:</u>

- Liaising with the board of trustees on an agreed basis with regards to safeguarding matters.
- Undertaking any responsibilities delegated to them by the board of trustees.
- Liaising with the Trust DSL on an agreed basis regarding safeguarding matters.
- Taking leadership responsibility for safeguarding arrangements within the trust.

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- Ensuring that accurate and effective recordkeeping of concerns and incidents is in place.

Headteachers in each school throughout the trust have a duty to:

- Ensure that the policies and procedures adopted by the trust, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Ensure that appropriate filtering and monitoring systems are implemented and that staff understand their roles and responsibilities in relation to filtering and monitoring.
- Provide staff within the school with the appropriate policies and information upon induction.
- Ensure that staff implement appropriate filters and monitoring of online material.
- Ensure that the school within the trust practises safe recruitment in checking the suitability of staff and volunteers to work with children in accordance with the guidance in KCSIE 2026.
- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.
- Ensure that appropriate contact with pupils does not prevent staff members from using reasonable force and other restrictive interventions.

<u>The School DSL's have a duty to:</u>

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Coordinate the school's approach to community-based early help and targeted family help.
- Report on an agreed basis to the board of governors via the agreed route of communication.
- Refer cases:
    - To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
    - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff within their school has access to and understands the trust-wide and individual school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the board of trustees or delegated authority to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Understand the importance of information sharing within the trust, including within school, with the trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's Child Protection and Safeguarding Policy and their job description.
- Adhere to any safeguarding arrangements specified in the trust's funding agreement.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

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TLP schools will ensure that appropriate arrangements are in place to provide effective DSL cover during school hours. Safeguarding information will be shared securely where necessary to ensure continuity of safeguarding arrangements and timely responses to concerns.

All teachers within the trust, including headteachers, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards.'
- Report, by law, any instances of FGM to the police.
- Adhere to the guidance that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

All staff within the trust and its schools have a responsibility to:

- Consider, at all times, what is in the best interests of the pupils in the trust.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide safe environments in which pupils can learn.
- Read and understand at least 'Part one' of KCSIE.
- Be aware of the trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and DDSL(s) within the relevant school.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the school's arrangements for community-based early help and targeted family help and understand their role in identifying pupils who may benefit from support before statutory intervention.
- Be aware of local safeguarding partnership arrangements and understand the referral pathways to CSCS.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant school.
- Be aware of and understand the trust's procedure to follow in the event that a pupil confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their school's DSL or DDSL(s) if they are unsure about how to manage safeguarding matters.
- Be aware of safeguarding issues that, including technology-facilitated abuse, can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.

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3. Multi-Agency Working

TLP schools contribute to multi-agency working as part of its statutory duty. The trust is aware of, and will follow, the local safeguarding arrangements.

The schools within the trust will be fully engaged, involved, and included in the child-centred approach towards local safeguarding arrangements. Once the trust and its schools are named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. Schools within the trust will act in accordance with the trust's safeguarding arrangements.

The trust will work collaboratively with families and partner agencies to safeguard and promote pupils' welfare, through community-based early help and targeted family help, and by contributing to coordinated multi-agency plans to support children and families.

Where a child may benefit from family help, the trust will work with partner agencies and contribute to multi-agency assessments and plans.

The trust will allow CSCS from the host LA and, where appropriate, the placing LA, access to pupils to enable them to undertake or consider assessments under sections 17 or 47 of the Children Act 1989.

The trust will also be mindful of the importance of inter-agency working in identifying and preventing CSE, CCE and other forms of extra-familial harm.

The trust will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspective to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Understanding its role within the local safeguarding arrangements.
- Mutually and constructively challenging other's assumptions in a respectful manner

<u>Information sharing</u>

The trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for community-based early help or family help.

Considering the above, staff within the trust will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will be made aware that there may be legal or statutory requirements to share information for safeguarding purposes when requested by relevant agencies.

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Staff members within the trust and its schools will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If school staff members are in doubt about sharing information, they will speak to their school's DSL or DDSL(s).

Where decisions are made about sharing or withholding information, these will be based on consideration of the risks to the pupil and, where appropriate, the rationale for decisions will be recorded.

4. Support before Statutory Intervention

Support before statutory intervention means providing help as soon as a problem emerges, at any point in a child's life. This may include support from universal services, community-based early help, or targeted family help, depending on the child's level of need.

Any pupil may benefit from support before statutory intervention; however, staff will be particularly alert to the potential need for community-based early help or family help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have a mental health need.
- Are young carers.
- Are pregnant or are a parent themselves.
- Have exhibited early signs of abusive, violent or harmful behaviours.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Have been repeatedly removed from the classroom.
- Have experienced multiple suspensions.
- Are on a part-time timetable.
- Are at risk of being permanently excluded or are in alternative provision or a pupil referral unit.
- Are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Are at risk of being radicalised into terrorism.
- Have family members in custody or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of honour or faith-based abuse, such as FGM or forced marriage.
- Are privately fostered.

Schools within the trust will not limit support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from community-based early help or family help.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

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The DSL and other welfare staff will take the lead where family help or community-based early help is appropriate. This includes liaising with other agencies and arranging a multi-agency family help assessment where appropriate, following local safeguarding partnership procedures.

Staff may be required to support other agencies and professionals during a community-based early help or family help assessment and, in some circumstances, may act as the Lead Practitioner, where appropriate and in accordance with local arrangements. All cases will be reviewed regularly and consideration given to referral to CSCS where the child's circumstances do not improve or where the level of risk increases.

Staff will be made familiar with the local thresholds for community-based early help, family help, Section 17 (Children in Need) and Section 47 (Child Protection) and will follow local safeguarding partnership procedures when making referrals.

5. Abuse, Neglect and Exploitation

All staff will be aware of the indicators of abuse, neglect, exploitation, and modern slavery and will understand that children can be at risk of harm inside and outside of school, inside and outside of home, and online. Staff will also be aware that pupils can be affected by seeing, hearing, or experiencing the effects of abuse.

All staff working within the trust will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. Staff will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

All staff working within the trust will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially schools' DSLs and DDSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of harms outside their families (extra-familial harms).

These harms include, but are not limited to:

- Sexual abuse, including harassment and exploitation.
- Domestic abuse in their own intimate relationships, including physical, sexual, emotional abuse, and stalking.
- Criminal exploitation, including financial exploitation.
- Serious youth violence.
- County lines.

- Radicalisation.

All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues and that risks such as abuse can take place online as well as face to face.

Staff will also understand that child-on-child abuse can occur online and can take the form of:
- Abusive, harassing, misogynistic, or misandrist messages.
- The non-consensual making or sharing of nudes or semi-nudes, particularly within group chats.
- Sharing of abusive images and pornography to those who do not wish to receive such content.

Staff will always speak to the DSL or DDSL(s) if they are unsure about something in relation to abuse, neglect, or exploitation.

6. Specific Safeguarding Issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be made aware of these issues.

Appendix A of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

7. Child-on-child abuse, including sexual harassment and sexual violence

For the purposes of this policy, **"child-on-child abuse"** is defined as abuse between children.

The trust has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy's statement of intent.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online.

All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring.

All staff will speak to their school's DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as "banter" or "part of growing up". Staff will understand that recognising behaviours early and putting in place timely, evidence-based support can be vital in preventing child-on-child abuse.

All staff will be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

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Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Serious physical assault and harm, or threat of harm with a weapon – this may include an online element which facilitates, threatens, and/or encourages physical abuse.
- Sexual violence such as rape, assault by penetration and sexual assault – this may include an online element which facilitates, threatens, and/or encourages sexual violence.
- Sexual harassment such as sexual comments, remarks, jokes, and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual making or sharing of nudes and semi-nudes.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their private areas to obtain sexual gratification.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse, or humiliation used as a way of initiating a person into a group – this may also include an online element.

The trust is aware that some children may be particularly vulnerable to child-on-child abuse. The trust recognises that children with SEND or certain medical or physical health conditions may face additional safeguarding challenges and may be more vulnerable to abuse, bullying and prejudice-based bullying. Staff will recognise that children with disabilities are three times more likely to be abused than their peers and will consider whether additional pastoral or safeguarding support is required.

The trust understands that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality, or disability and will ensure that all schools within the trust give special consideration to, amongst others, children who:

- Have SEND.
- Are vulnerable to being bullied.
- Are looked after or living in unsupportive home situations.

DSLs working in schools within the trust will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the trust's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

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The trust's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the trust's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

The trust recognises that harmful behaviours exist on a continuum and will respond proportionately, considering the age, developmental stage, intent, frequency, and seriousness of the behaviour, as well as the needs of all children involved.

8. Online Safety and Technology

The trust will ensure that schools within the trust adhere to the Online Safety Policy at all times.
As part of a broad and balanced curriculum, all pupils within the trust's schools will be made aware of online risks and taught how to stay safe online.

Through training, all staff within the trust will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Staff training in online safety will cover the four categories of risk as outlined in KCSIE:

- **Content** - Staff will be trained to understand the risks associated with being exposed to illegal, inappropriate, or harmful material. This will include, but not be limited to, content relating to pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, and conspiracy theories.
- **Contact** - Training will address the risks of harmful online interaction with other users or generative AI applications that simulate this. This will include peer-to-peer pressure, exposure to commercial advertising, and the threat posed by adults impersonating children or young people with the intention of grooming or exploiting them for sexual, criminal, financial, or other purposes.
- **Conduct** - Staff will be made aware of how certain online behaviours may increase the likelihood of harm or result in actual harm. This will encompass activities such as making, sending, or receiving explicit images, including those generated using AI and instances of online bullying.
- **Commerce** - The programme will also cover risks related to online commerce. These will include dangers such as online gambling, exposure to inappropriate advertising, phishing attempts, and other types of financial scams.

The trust will ensure that each of its schools have appropriate filtering systems in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the filtering and monitoring standards published by the DfE.

All staff within the trust will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the trust's approach to online safety can be found in the Online Safety Policy.

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Communicating with Parents

As part of the usual communication with parents, the trust will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems their child's school uses to filter and monitor internet use.

Schools will be expected to make it clear to parents what their children are being asked to do online for school.

Reviewing Online Safety

Schools within the trust will carry out a review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

Schools within the trust will also review the effectiveness of its filtering and monitoring systems at least annually. This review will be led by the member of the SLT responsible for filtering and monitoring, with support from the DSL and ICT support where appropriate. The review will include checks that filtering and monitoring systems are operating effectively on all internet-connected devices in relevant locations, and a written record of the review will be maintained.

Mobile Devices Policy

The trust will ensure that pupils do not have access to mobile phones throughout the school day, including during lessons, the time between lessons, breaktimes and lunchtime, except where an exemption applies. The trust's approach to mobile phones and smart technology will be set out in the Mobile Devices Policy and will take account of the safeguarding risks associated with pupils having unlimited and unrestricted access to the internet via mobile networks.

9. Making or Sharing of Nudes or Semi-nudes

The trust will ensure that staff are aware to treat the consensual and non-consensual sharing of nudes and semi-nudes as a safeguarding concern, including where these images are generated by AI.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that making or sharing imagery depicting nudes or semi-nudes of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

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10. Appropriate Physical Contact with Pupils

The trust will not operate a 'no contact' policy. The trust will also not agree to any request from parents or staff that would prevent the use of reasonable force and other restrictive interventions where these may be necessary and lawful. A 'no contact' approach could leave staff unable to intervene appropriately to safeguard pupils and others.

Restrictive intervention and reasonable force may be used in limited circumstances and will be managed in line with the Restrictive Intervention Policy.

The trust will adopt sensible policies and practices which will allow and support staff to make appropriate physical contact with pupils where this is necessary, proportionate, and in the best interests of the child. There will be circumstances in which physical contact will be appropriate and will not give rise to concerns about the use of reasonable force or restrictive interventions.

Examples of circumstances where physical contact will generally be appropriate include:

- Providing first aid.
- Guiding or escorting pupils, e.g. holding the hand of a younger pupil when moving around the school or on a school trip, supporting a pupil to move to a space they have chosen to access in order to self-regulate, or assisting pupils to move safely.
- Comforting a distressed pupil.
- Congratulating or praising a pupil, e.g. a handshake or a brief pat on the back.
- Demonstrating how to use a musical instrument.
- Demonstrating exercises or techniques during PE lessons or sports coaching.

When deciding whether physical contact will be appropriate in a particular situation, staff will use their professional judgement and will have regard to:

- This policy and any other relevant policy.
- The context and circumstances, including whether other adults are present.
- The individual pupil's age and level of understanding.
- Any other relevant factors, including, but not limited to:
    - Whether the pupil has SEND or other vulnerabilities.
    - Whether alternative strategies that do not involve physical contact could be used.

11. Context of Safeguarding Incidents

Safeguarding incidents can occur outside of schools within the trust and can be associated with outside factors. All staff, particularly DSLs and DDSL(s), will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The schools within the trust will provide as much contextual information as possible when making referrals to CSCS.

12. Pupils potentially at greater risk of harm

Each school within the trust recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse, neglect and exploitation. Each school will ensure that safeguarding concerns involving these pupils are responded to appropriately, taking account of their individual needs and circumstances.

Pupils who need social workers

Pupils may need social workers due to abuse, neglect, exploitation or complex family circumstances. Their experiences of adversity and trauma may leave them vulnerable to further harm and educational disadvantage, including barriers to attendance, learning, behaviour and mental health.

As a matter of routine, the DSL within each school will hold and use information from their LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Children who are absent from education

The trust recognises that pupils who are absent from education for prolonged periods and/or on repeated occasions may be at increased risk of abuse, neglect, CCE and CSE, including county lines.

The trust will respond to concerns relating to attendance in accordance with its Attendance Policy and Children Missing Education Policy and will work with CSCS and other agencies where absence gives rise to safeguarding concerns.

Home-educated children

Whilst many home educated children receive suitable education, the trust recognises that elective home education (EHE) can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, each school within the trust will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from a school within the trust for EHE, the school, in collaboration with the trust, LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Pupils requiring mental health support

The trust recognises that mental health problems can, in some cases, develop into safeguarding concerns. This may include self-harm, signs of an eating disorder, suicidal ideation or suicide, or indicate that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals will make a diagnosis of a mental health condition; however, all staff will play an important role in promoting positive mental wellbeing, identifying pupils who may require support, ensuring there is early intervention and the referral concerns where appropriate.

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Where support is required, the DSL or DDSL(s) will consider whether parents should be informed where doing so will not place the pupil at additional risk. Where safeguarding concerns are linked to a pupil's mental health or emotional wellbeing, the DSL or DDSL(s) will liaise with the school's senior mental health lead to ensure the pupil receives coordinated support.

A trust-wide approach to promoting positive mental health and wellbeing will be maintained and schools within the trust will make use of appropriate internal and external support services where required.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously LAC (PLAC), also known as care leavers, can also remain vulnerable after leaving care.

The board of trustees will ensure that staff in the trust have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL in each school will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in each school's LAC Policy.

Young Carers

The trust recognises that caring responsibilities may have a significant impact on a pupil's attendance, attainment, behaviour and wellbeing.

The trust will seek to identify young carers at the earliest opportunity and will work with pupils, families and external agencies to ensure that appropriate support is provided.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware that:

- Certain indicators of abuse, such as behaviour, mood, and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as peer isolation, bullying, and prejudice-based bullying without outwardly showing any signs.
- Communication barriers may make it more difficult for pupils to recognise, disclose, or report abuse.
- Pupils with SEND may not always recognise that what is happening to them is abuse.
- Pupils requiring intimate care or who are more isolated from others may be at increased risk.
- Pupils may be more dependent on adults for care.

- Pupils may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.

When responding to safeguarding concerns involving pupils with SEND, the DSL will liaise with the SENCO and, where appropriate, parents and external agencies to ensure that the pupil receives appropriate support.

The trust will also consider whether additional pastoral support or communication support is required.

Pupils who are lesbian, gay, or bisexual

The fact that a pupil is lesbian, gay, or bisexual is not, in itself, a risk factor for harm; however, the trust recognises that these pupils, or those perceived to be lesbian, gay, or bisexual, may be more vulnerable to discriminatory bullying.

The trust will take appropriate steps to prevent and respond to bullying and ensure that all pupils feel safe, respected, and supported.

Pupils who are questioning their gender

The trust recognises that some pupils may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs.

Schools within the trust will take time to understand the individual circumstances of pupils who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the pupil and taking account of the safety and wellbeing of all pupils.

Schools within the trust will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, the school will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the pupil at risk of significant harm, working in partnership with parents.

Where a pupil discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL in order to safeguard and promote the pupil's welfare.

The trust will maintain a culture in which bullying is not tolerated and will ensure that pupils who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with trusted members of staff.

All DSLs within the trust will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

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13. Use of school premises for non-school activities

Where a school within the trust hires or rents out school facilities or school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe, including seeking approval from the board of trustees, where required. The trust will ensure that schools within the trust refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where a school within the trust provides the activities under the direct supervision or management of school staff, child protection arrangements will apply.

Where activities are provided separately by another body, this may not be the case; therefore, the board of trustees or delegated authority will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

The board of trustees or delegated authority will also ensure that there are arrangements in place to liaise with schools within the trust on these matters where appropriate. The board of trustees or its delegated authority will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the schools in the trust to effectively safeguard pupils and adhere to local and trust-wide safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

14. Alternative Provision (AP)

The trust will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the trust will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of alternative provision will be aware that pupils in AP will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

Schools within the trust will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment. This will

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include written confirmation that the alternative provider will inform the school of any arrangements that may put the pupil at risk.

The trust will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting each pupil's individual needs.

The trust will ensure that the location of pupils placed at AP is always known and will maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend.

AP placement reviews will take place at least half termly to ensure that pupils are regularly attending, and the placement continues to be safe and meets their needs.

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

15. Work Experience

The trust will ensure that schools have the appropriate procedures in place to ensure that providers of work experience have appropriate safeguarding policies and procedures in place.

The trust will not allow someone on the barred list to engage in regulated activity with a pupil on a work experience placement.

Where pupils are undertaking work experience at the trust or one of the schools within the trust, an enhanced DBS check will be obtained if the pupil is over the age of 16.

16. Homestay Exchange Visits

School-arranged homestays in UK

Where schools within the trust are arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the trust will ensure that schools within the trust are aware of the need to obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, schools will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, schools will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

The trust will ensure that schools within the trust are aware of their responsibility to liaise with partner schools to discuss and agree the arrangements in place for the visit. Schools within the trust will be expected to consider, on a case-by-case basis, whether to contact the relevant foreign embassy or

High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.

Each school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement, and the individual trust school is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the trust becomes aware of a pupil being privately fostered, it will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

17. Reporting and responding to concerns about pupils

Reporting concerns

Staff across the trust will maintain an attitude of "it could happen here" where safeguarding is concerned. Staff will always act in the best interests of a pupil when they are concerned about their welfare.

Staff will be aware that data protection legislation does not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Where there is any doubt about sharing information, staff will seek advice from the DSL or DDSL(s). Concerns about sharing information must not prevent the timely sharing of information where this is necessary to safeguard and promote the welfare of children.

If a member of staff has any concern about a pupil's welfare, or a pupil reports a safeguarding concern about themselves or another pupil, the member of staff will act immediately by reporting the concern to their school's DSL or DDSL(s) in line with the trust's safeguarding procedures.

Staff will not assume that a colleague or another professional will take action or share information that may be critical to keeping a pupil safe. Staff will recognise that early information sharing is essential to the effective identification, assessment, and provision of appropriate support.

Where the school's DSL is unavailable, staff will report the concern to a DDSL(s). In exceptional circumstances, where neither the DSL nor DDSL(s) are immediately available, this will not delay appropriate action being taken. Staff will seek advice from a member of the SLT and/or the relevant LA children's social care, as appropriate. Any action taken in these circumstances will be shared with the DSL or DDSL(s) as soon as possible.

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Determining the appropriate response

Following a report, the DSL or DDSL(s) will consider the information provided, the pupil's level of need, any known history and the local safeguarding threshold guidance before determining the most appropriate course of action.

This may include:

- Providing or coordinating appropriate support within the school through pastoral or wellbeing processes, including considering, where it is safe and appropriate to do so, whether parents should be informed to support the pupil's wellbeing.
- Undertaking or contributing to an early help or family help assessment.
- Making a referral to CSCS or other statutory services where a pupil may be in need, is suffering, or is likely to suffer significant harm.

Where a community-based early help or family help assessment is undertaken, the DSL will normally coordinate the school's involvement with partner agencies. Staff will contribute to assessments, planning, and review meetings as required. The trust will keep all safeguarding cases under regular review and will request additional intervention or make further referrals where a pupil's circumstances do not improve or where risks increase.

Staff will be expected to familiarise themselves with the DfE's guidance on information sharing to support decision-making where information needs to be shared to safeguard children.

Referrals and multi-agency working

Where a pupil is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to the relevant LA children's social care and/or the police, as appropriate. Referrals will follow the procedures of the relevant local safeguarding partnership for the school concerned. Where a criminal offence is suspected, including incidents of sexual violence, the police will be informed without delay.

The trust and its schools will follow the reporting and referral process set out in KCSIE and the procedures of the relevant local safeguarding partnership.

DSLs will be familiar with the safeguarding referral arrangements that apply within their LA area and will provide advice and support to staff as required. Information will be shared with external agencies in accordance with data protection legislation, information sharing guidance and the trust's confidentiality and records management procedures.

Where a school makes a referral to CSCS, the DSL will expect confirmation of the LA's decision within one working day and will follow up if this is not received.

Where CSCS decides to undertake a statutory assessment, the DSL or DDSL(s) will work proactively with partner agencies and relevant staff to support the assessment process.

If concerns remain following a referral or the pupil's circumstances do not improve, the DSL will escalate concerns or seek reconsideration in accordance with local safeguarding partnership procedures.

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DSLs will maintain effective working relationships with CSCS, the police, and other relevant agencies to promote pupils' welfare while ensuring that the actions of the school do not compromise any ongoing investigation.

The trust and its schools will not wait for the outcome of a statutory assessment or criminal investigation before taking appropriate action to safeguard and support a pupil. Where statutory intervention is not required, appropriate support will continue to be considered through early help, family help, pastoral support or other suitable interventions.

Supporting pupils and recording concerns

Where safeguarding concerns arise, the trust will ensure that the wishes and feelings of the pupil are considered in decisions affecting them, in accordance with their age and understanding. Pupils will be given opportunities to express their views and will be listened to, taken seriously, and supported. Discussions with parents will take place where appropriate and where doing so will not place the pupil or others at increased risk of harm. The school will work in partnership with parents and relevant agencies wherever this is in the pupil's best interests.

All safeguarding concerns, discussions, decisions, and the reasons for those decisions will be recorded promptly by the DSL or DDSL(s) and maintained securely in accordance with the trust's records management procedures. Records will be transferred securely when a pupil moves to another education setting, in line with statutory guidance.

18. Concerns about trust safeguarding practices

Any concerns regarding the safeguarding practices at the trust will be raised with the SLT of the school, and the necessary whistleblowing procedures will be followed, as outlined in the trust's Whistleblowing Policy. If a staff member feels unable to raise an issue with their school's SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

19. Safeguarding concerns and allegations of abuse against staff

All allegations against school staff, trust staff, supply staff, volunteers and contractors will be managed in line with the relevant Allegations of Abuse Against Staff Policy and the procedures laid out by the individual school at which the staff members work or have worked. The trust will ensure its schools are equipped to manage all allegations against staff, including those who are not employees of schools within the trust, and that the affected schools liaise with the relevant parties.

When managing allegations against staff, the trust will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns."

- Allegations that meet the harms threshold include instances where staff have:
- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Low-level concerns will be managed in line with the affected school's reporting low-level safeguarding concerns process.

20. Communication and confidentiality

When recording, holding, using and sharing information, the DSL at each school within the trust will ensure that they:

- Understand the importance of information sharing, both within their school and the trust, and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the data protection policies of the trust and individual schools within the trust.
Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the trust and affected schools will consult its relevant policies and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the trust and its schools will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection, or prosecution of a serious crime. Before doing so, the DSL of the affected school will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL of the affected school will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the trust will ensure the appropriate disciplinary procedures are implemented as necessary and will analyse how damage can be minimised, and future breaches be prevented.

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21. Safer Recruitment

The trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy. An enhanced DBS check with barred list information will be undertaken for all staff members and volunteers engaged in regulated activity.

The trust will determine whether a role constitutes regulated activity in accordance with current legislation and DfE guidance, including the DBS Workforce Guides. This will include staff, volunteers, and third-party personnel engaged in regulated activity. Where a role constitutes regulated activity, an enhanced DBS certificate with barred list information will be obtained before the individual begins work.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The board of trustees will conduct the appropriate pre-employment checks for all prospective trust employees, including internal candidates and candidates who have lived or worked outside the UK. This responsibility may be delegated by the board of trustees as required.
The appropriate DBS and suitability checks will be conducted for all trustees and local governors, volunteers, and contractors within the trust.

The chair of trustees will undertake a suitability check by the DfE and an enhanced DBS check that will be conducted regardless of checks previously performed by other organisations or how recently these took place.

Referral to the DBS

The trust will refer an individual to the DBS where the legal duty to do so is met, including where they have harmed, or pose a risk of harm to, a pupil and have been removed from regulated activity, or would have been removed had they not resigned, retired or otherwise left their role.

22. Single Central Record (SCR)

The trust will maintain a SCR detailing the checks conducted in each school within the MAT.

The SCR will contain information on all staff, including agency and third-party supply staff, volunteers in regulated activity, and teacher trainees on salaried routes, who work at the trust, as well as members of the proprietor body.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

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The trust will ensure that schools within the trust have appropriate procedures in place for ensuring that the necessary checks have been conducted by the employment business supplying any members of staff for agency and third-party supply staff, and that written confirmation has been received confirming this. This will amount to all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery, and the date that confirmation was received.

The SCR will also record:
- Checks that have been conducted for volunteers.
- Any risk assessments that have been conducted to assess whether a volunteer should be subject to an enhanced DBS check.
- Written confirmation that supply agencies have completed all relevant checks.
- Any other information that the trust or its schools deem relevant to keep children safe.

The details of an individual will be removed from the SCR once they no longer work at the trust or any of its schools.

23. Training

The trust will ensure that staff working in each of its schools undergo safeguarding and child protection training at induction, which will be updated regularly and/or whenever there is a change in legislation.

The induction training will cover:
- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE)
- The Behaviour Policy.
- The Children Missing from Education Policy, including the safeguarding response to children who are absent from education.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and DDSL(s).

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:
- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE, CSE, modern slavery and trafficking, including where a referral to National Referral Mechanism may be appropriate.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

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DSLs and DDSL(s) will undergo child protection and safeguarding training and update this training at least every two years. The DSL and DDSL(s) will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role.

This will include training to understand:

- The assessment process for providing community-based early help, family help, and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND

24. Monitoring and review

This policy is reviewed at least annually by the DSL and the headteacher. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is August 2027.

The trust will ensure that any child protection incidents at any of its schools will be followed by a review of the safeguarding procedures within that school and a prompt report to the governing board. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the school's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

- The DSL conducts an investigation as a priority and comply with any deadlines given
- The Chair of the Governors reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- The school endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

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Appendix A: Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

The trust recognises that many of the safeguarding issues described in this appendix may be facilitated by technology or occur wholly online. Staff will remain alert to online indicators of abuse, exploitation, and harm and respond in accordance with this policy.

Here are the issues covered:

1. Domestic abuse
2. Homelessness
3. Children absent from education
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. County lines
7. Cyber-crime
8. Child sexual exploitation (CSE)
9. Modern slavery
10. FGM
11. Virginity testing and hymenoplasty
12. Forced marriage
13. Radicalisation
14. Pupils with family members in prison
15. Pupils required to give evidence in court
16. Mental health
17. Serious violence
18. Adult involvement in the making or sharing of nude or semi-nude images

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected.

"Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

"Personally connected" includes people who:

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- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Staff will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and DDSL(s) in each of the trust's schools will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to."

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The trust will ensure that its schools respond to children persistently being absent from education and will support schools in identifying such abuse and help prevent the risk of pupils becoming absent from education in the future.

Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy.

Schools within the trust will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Schools within the trust will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

Admissions register

Pupils will be placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

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The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies a school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, schools will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

Schools will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the relevant school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable

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- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school and will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, "child abduction" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Schools within the trust will provide pupils with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, "child criminal exploitation" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

All staff within the trust's schools will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. Schools will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, "county lines" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging,' where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer.

Crimes include:

- Unauthorised access to computers, known as 'hacking.'
- Denial of Service attacks, known as 'booting.'
- Making, supplying or obtaining malicious software, or 'malware,' e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator

- Through violence or the threat of violence

School staff will be able to recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media.

Schools will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. Staff will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:
- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the Child Sexual Exploitation (CSE) Policy. Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then manage the matter to conclusion. The school will cooperate as needed.

Modern slavery

For the purposes of this policy, "modern slavery" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff within the trust will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, "FGM" is defined as all procedures involving the 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.

All trust staff will be alert to the possibility of a pupil being at risk of FGM or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been conducted. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. NB: This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All trust staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:
- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:
- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman.'
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All trust staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:
- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending prolonged periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called "'honour-based' abuse (HBA)," which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

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Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to conduct, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status.

All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a prolonged period which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one

- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or notable change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

Schools within the trust will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.

- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victim's needs at an early stage and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:
- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

Schools will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

Schools will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

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Schools will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this policy, **"radicalisation"** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "**extremism"** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "**terrorism**" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the trust's wider safeguarding duties. Schools within the trust will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. The trust will ensure that procedures are in place for staff to be alerted to changes in pupils' behaviour which could indicate that they may need help or protection.

The trust will also ensure that staff can use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The trust and its schools will work together with local safeguarding arrangements as appropriate.

The trust will ensure that schools engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the trust will assist and advise family members who raise concerns and provide information for support mechanisms.
The DSLs in the schools within the trust will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools within the trust are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty". The Prevent duty will form part of the trust's wider safeguarding obligations.

The trust's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in school-level Prevent Duty Policies.

Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support, as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet 'Going to Court' appropriate to their age from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All staff within the trust will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems and schools will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. The trust will ensure that staff are also aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff within the trust and its schools who have a mental health concern about a pupil that is also a safeguarding concern are encouraged by the trust to act in line with this policy and their school-level Child Protection and Safeguarding Policy and speak to the DSL or DDSL(s).

The trust will ensure its schools can access a range of advice to help staff members identify pupils in need of additional mental health support, including working with external agencies. It will also ensure that there is a wide variety of advice and support offered to its schools while ensuring an ethos that is positive towards being open about mental health is adopted and implemented in each school.

In all cases of mental health difficulties, the Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.

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- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been suspended, spent time in AP or permanently excluded from school.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having previously been a victim or previously perpetrated violence.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Schools within the trust will cooperate with safeguarding partners, CSCS, the police, and other relevant agencies where appropriate.

Adult involvement in the making or sharing of nude or semi-nude images

The trust's full response to the making or sharing of nude or semi-nude images is outlined below

Sexually motivated incidents

The trust will remain aware that not all instances involving the making or sharing of nude or semi-nude images will be between children and young people, and in some cases may involve adults posing as a child for the purpose of obtaining nude and semi-nude images from persons under 18.

Staff will be aware of the signs that an adult is involved in the sharing the nude or semi-nude images. These include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing unsolicited sexual images.
- The conversation being moved from a public to a private and/or encrypted platform.
- Being coerced or pressured into doing sexual things, including producing sexual imagery.
- Being offered money or gifts.
- Being threatened or blackmailed into sharing nude or semi-nude images, and/or further sexual activity.

Financially motivated incidents

Financially motivated incidents involving the making or sharing of nude or semi-nude images involving adults may also be called **"sextortion",** where the offender threatens to release nudes or semi-nudes of a child or young person unless they do something to prevent it, e.g. paying money.

In these cases, offenders often pose as children and:

- Groom or coerce the victim into sending nudes or semi-nudes in order to blackmail them.
- Use images that have been stolen from the child or young person, e.g. via hacking.
- Use digitally manipulated and/or AI-generated images of the child or young person.

Staff will be aware of the signs of sextortion, which include:

- Being contacted by an online account they do not know but appears to be from somebody under the age of 18.
- Quickly being engaged in sexually explicit communications.
- The offender sharing sexual images first.
- The conversation being moved from a public to a private and/or encrypted platform.
- Told their online accounts have been hacked in order to obtain images, personal information, and contacts.
- Being blackmailed into sending money or sharing bank account details.
- Being shown stolen or digitally manipulated/generated images of the victim.

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Acronyms – Appendix B

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.

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DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout a school within the trust, or across a group of schools.
DDSL	Deputy designated safeguarding lead	A member of the senior leadership team who deputises for the DSL in their absence, or if they are unavailable.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
FGM	Female genital mutilation	All procedures involving the 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.
UK GDPR	The UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.

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HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the UK and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in LA care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.

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PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of a school's special educational needs and disabilities (SEND) policy and provision of education to pupils with SEND.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads oversee promoting the educational achievement of all the children looked after by the LA they work for, and all children who currently have, or previously had, a social worker.

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Appendix C: Definitions

The terms **"children" and "child"** refer to anyone under the age of 18.

For the purposes of this policy, "safeguarding and protecting the welfare of children" is defined as:

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

For the purposes of this policy, **"consent**" is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, **"sexual violence"** refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **"sexual harassment**" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.

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- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
    - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
    - Sharing unwanted explicit content.
    - Upskirting.
    - Sexualised online bullying.
    - Unwanted sexual comments and messages, including on social media.
    - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **"upskirting**" refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, **"making or sharing of nude or semi-nude images and/or videos"** refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared online or offline.

"**Deepfakes" and "deepnudes**" refer to digitally manipulated or AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with the trust's procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

For the purposes of this policy, **"abuse"** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, **"physical abuse"** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, **"emotional abuse"** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or

how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, **"sexual abuse"** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **"neglect"** is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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