



Central England Academy Trust

Child protection policy 2026/27

Trust Central Staff

Date of publication: 1st September 2026

Review date: 1st September 2027

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Reviewed by:

Designated Safeguarding Lead/ CEO – Andrew Dickinson

Date: 31st August 2026

Deputy Designated Safeguarding Leads – Jen Roberts, Claire Warren, Ben Elliott

Date: 31st August 2026

Chair of Trustees – Carole Davies

Nominated Safeguarding Trustee – Farhana Ahmedabadi-Patel

Date: 31st August 2026

Policy statement and principles

Safeguarding is a key strategic priority for Central England Academy Trust and we are committed to the safety, welfare and well-being of all whom are a part of the Trust community. Our CEO leads safeguarding across our Trust, and each individual school also has their own Designated Safeguarding Lead (DSL). This policy is one of a series in the Trust/School's integrated safeguarding portfolio which includes each school's designated safeguarding lead arrangements, staff behaviour (code of conduct), safer recruitment policy, allegations against staff, complaints, pupil behaviour and online safety.

The school's safeguarding arrangements are inspected by Ofsted as a standalone core evaluation area. Safeguarding is judged purely on a **met** or **not met** basis. The Trust provides support and challenge to enable school leaders to fulfil their roles.

This policy is available on the Trust website and all central staff are required to read it and confirm they have done so in writing before commencing work in school. **Central staff will follow individual school's safeguarding policy and procedures whilst on their school site.**

Child protection statement

We, the Board of Trustees and central staff at Central England Academy Trust recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where **all** children (including those having protected characteristics under the Equalities Act 2010) are respected, valued, feel secure, are encouraged and given opportunities to talk to trusted adults who listen to them. We are alert to the signs of abuse, exploitation and neglect and follow our procedures to ensure that **all** children receive effective support, protection and justice.

The procedures contained in this policy apply to all central staff and trustees. They are consistent with statutory guidance and those of the locally agreed multi-agency safeguarding arrangements put in place by Warwickshire Safeguarding Partnership.

Policy principles:

- Safeguarding is everyone's responsibility.
- The Trust responsibility to safeguard and promote the welfare of children is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, UK residence status, religion or sexual identity, have equal rights to be safe, feel safe, protection and to have their welfare promoted.
- Children who are safe and feel safe are better equipped to learn.
- Our Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, visiting professionals and parents/carers to share that commitment.
- Pupils are encouraged to talk to any member of staff about anything they are worried or distressed about. All adults working at Central England Academy Trust are therefore expected to build trusted relationships with children, to take all welfare concerns seriously and always to act in the best interests of children; while remembering that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful.

- Due to their day-to-day contact with pupils, staff at Central England Academy Trust are uniquely placed to observe changes in children's behaviour and the outward signs of abuse (including child-on-child abuse), neglect, exploitation and radicalisation. Children may also turn to a trusted adult at Central England Academy Trust when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse, exploitation and neglect; maintain a professional curiosity about children; are approachable and trusted by pupils; listen actively to them and understand the procedures for reporting any concerns.
- The Trust will act on identified concerns and will provide early help to prevent concerns from escalating.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in school.
- All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. That includes incidents of child-on-child abuse.
- If, at any point, there is a risk of immediate serious harm to a child, a referral will be made to Children's Social Care and/or the Police immediately. **Anybody can make a referral.** If the child's situation does not appear to be improving, any staff member with concerns should press the Designated Safeguarding Lead (DSL) for re-consideration.
- If a member of staff remains concerned about a child, they can discuss their concerns with the CEO/headteacher of the school or Trust/School DSL; Our schools are based in Warwickshire and Birmingham.

Warwickshire Schools - contact the Children and Families Front Door on 01926 414144 or via triagehub@warwickshire.gov.uk; or the Front Door Education Lead on 01926 418608 or via MASHeducationlead@warwickshire.gov.uk for additional advice as necessary.

Birmingham Schools –

<https://westmids-birmingham.trixonline.co.uk/>

CASS contact details

Monday to Thursday 8.45am - 5.15pm and Friday 8.45am - 4.15pm

Phone 0121 303 1888 and select Option 2 then Option 2

Emergency out of hours - Phone 0121 675 4806

https://www.birminghamchildrenstrust.co.uk/info/3/information_for_professionals/311/i_need_professional_help_with

- Pupils and staff involved in child protection issues will receive appropriate support.
- This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review. Representatives of the Trust community will be involved in reviewing, shaping and developing the Central team safeguarding arrangements and child protection policy.

Policy aims:

- To provide all staff (see definition below) with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent good practice.
- To inform pupils, parents and other stakeholders (e.g. partner agencies) about the Trust Central team arrangements for safeguarding pupils. Our schools all have their own policy which is published on our website.
- To demonstrate the Trust's commitment with regard to safeguarding and child protection to pupils, parents/carers and other partners.
- To contribute to the Trust/School's safeguarding portfolio.

Safeguarding legislation and guidance

Academies, free schools, independent schools, alternative providers of education
- Section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are pupils at the school.

- The **Teachers' Standards 2012** state that teachers, including headteachers, must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions; and uphold public trust in the teaching profession as part of their professional duties.
- The statutory guidance **Working Together to Safeguard Children (DfE 2026)** covers the legislative requirements and expectations of individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for the three local safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of Police for a Police area, any part of which falls within the local authority area) to make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs. The guidance confirms that it applies, in its entirety, to all schools.
- The statutory guidance **Keeping Children Safe in Education (KCSiE) (DfE 2026)** is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. Unless otherwise stated, 'school' in this guidance means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies, maintained nursery schools and pupil referral units. 'College' means further education colleges and sixth form colleges as established under the Further and Higher Education Act 1992, institutions designated as being within the further education sector under section 28 of the Further and Higher Education Act 1992 and providers of post 16 Education as set out in the Education and Training (Welfare of Children) Act 2021: 16-19 Academies, Special Post-16 institutions and Independent Training Providers. For colleges, Keeping Children Safe in Education relates to their responsibilities towards children who are receiving education or training at these institutions.

Keeping Children Safe in Education 2026 highlights it is essential that **everybody** working in a school or college understands their safeguarding responsibilities. **All** staff must read Part One of KCSiE and, in addition, all staff who work directly with children must also read Part Five and Annex A.

Staff can find a link to a copy of **Keeping Children Safe in Education 2026** on the Trust website.

As required by KCSiE 2026, the Board of Trustees will assist central staff to understand and discharge their role and responsibilities as set out in the parts of KCSiE they are required to read by facilitating training and collecting their signatures of assurance.

- **What to do if you're worried a child is being abused 2015 - Advice for practitioners** is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse, exploitation and neglect and take appropriate action –

please see [Child abuse concerns: guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/child-abuse-concerns-guide-for-practitioners)

- **Schools with children subject to the Early Years Foundation Framework** – in addition to the statutory guidance above, all schools that are also early years providers (i.e. those that care for **children aged from 0 until the 31 August after their 5th birthday**) must also have regard to the **Early years foundation stage statutory framework - for group and school-based providers**, with particular reference to section 3 *The Safeguarding and Welfare Requirements* - https://assets.publishing.service.gov.uk/media/68c024cb8c6d992f23edd79c/Early_years_foundation_stage_statutory_framework_-_for_group_and_school-based_providers.pdf

Terminology

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

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

Child protection refers to the processes undertaken to protect children who have been identified as suffering or are likely to suffer significant harm.

Significant harm is defined in section 31 of the Children Act 1989 as follows:

- "harm" means ill-treatment or the impairment of health or development
- "development" means physical, intellectual, emotional, social or behavioural development
- "health" means physical or mental health
- "ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical.

Staff refers to all those working for or on behalf of the Trust, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity.

Child/children includes everyone under the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Roles and responsibilities

Key personnel

The Designated Safeguarding Lead (DSL) is

Andrew Dickinson

email: Adickinson@centralengland.co.uk

tel: 02476 740932

The deputy Designated Safeguarding Lead is

Jen Roberts

email: jroberts@centralengland.co.uk

tel: 02476 740932

Other staff trained to undertake the functions of the Designated Safeguarding Lead are

Claire Warren - cwarren@centralengland.co.uk tel: 02476 740932

Ben Elliott - belliott@centralengland.co.uk tel: 02476 740932

All schools in our Trust have their own Lead and Deputy DSL'S. Details can be found on their school website.

The nominated safeguarding Trustee is Farhana Ahmedabadi-Patel

Contact details: email: fahmedabadi-patel@centralengland.co.uk tel: 02476 740932

All schools are required to appoint a member of the senior leadership team to take lead responsibility for safeguarding and child protection and to ensure there are appropriate cover arrangements.

The Designated Safeguarding Lead (DSL):

- is a senior member of staff from the Trust leadership team and therefore has the status, authority, skills and experience to carry out the duties of the post, including committing resources and supporting and directing other staff.
- takes lead responsibility for safeguarding and child protection in the Trust central team, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies. That responsibility includes online safety and ensuring the Trust's central ICT filtering and monitoring arrangements are effective in keeping pupils/students safe. The role and responsibility are explicit in the role holder's job description.
- is appropriately trained (including Prevent and online safety training), receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.
- acts as a source of advice, support and expertise to the Trust community.
- encourages a culture of listening to children and taking account of their wishes and feelings.
- is alert to the specific needs of children in need; those with special educational and mental health needs; children who are looked after or were previously looked after; children who have a social worker; and young carers, overseeing the provision of effective pastoral support to all of those children and promoting their educational outcomes by sharing information about their welfare, circumstances and needs with teachers and other staff as appropriate.
- works closely with school leaders in relation to safeguarding matters (including online and digital safety) and deciding whether to make referrals to relevant partner agencies.
- has a working knowledge of locally agreed multi-agency safeguarding arrangements and procedures put in place at our schools in Warwickshire and Birmingham.
- has an understanding of the local community-based early help and family help processes to ensure effective support, assessment and understanding of children's additional needs in order to inform appropriate provision of help, support and intervention to pupils and their families when their needs do not require statutory intervention.
- keeps detailed and accurate written records of all concerns, ensuring that such records are stored securely.
- refers cases of suspected abuse, exploitation or neglect to Children's Social Care or the Police as appropriate; and, when a crime may have been committed, refers cases to the Police.
- refers cases using the prescribed pro forma to Children's Social Care and the Prevent policing team for a joint assessment when there is a concern that a child is at risk of radicalisation; and to the Channel panel if subsequently advised to do so.
- ensures that staff do everything they can to support social workers and contribute to assessments of children when Children's Social Care become involved.
- will ensure that key central staff including deputy DSLs will consider what other information needs to be shared with other relevant staff in order for a pupil to be safeguarded effectively.
- attends and/or contributes to child protection conferences, strategy meetings, multi-agency exploitation meetings, child in need meetings and multi-agency meetings convened under local family help processes; or ensures that a suitably experienced deputy DSL represents the Trust/School's in all such meetings.
- ensures that all central staff sign to indicate that they have read and understand the child protection policy; the online safety policy (including their responsibilities in relation to the school's ICT filtering and monitoring arrangements); the staff behaviour policy (code of conduct); and Part 1 of *Keeping Children Safe in Education 2026* (and also Part 5 and Annex A in relation to staff who work directly with children)
- ensures that all central staff understand that if they have **any concerns** about a child's welfare, they should act on them immediately, either by speaking to the school's DSL (or a deputy) or, in exceptional circumstances such as a child being at immediate risk and no DSL being available, taking responsibility to make a referral to Children's Social Care.

- ensures that all central staff make a full record of **any** safeguarding concerns using CPOMS or a Green Form (if they do not have a login for CPOMS).
- ensures that all central staff know how to make a referral as detailed in this policy and that they are aware of the procedures for each school in the Trust.
- has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in paragraphs 29-54 (pages 14-20) and Annex A (pages 155-180) of *Keeping Children Safe in Education 2026*, ensuring that all staff receive regular updated safeguarding and online safety training, which includes their responsibilities for supervising pupils' use of internet-enabled technology and reporting any concerns to the DSL; and also reporting any failure of the Trust's ICT filtering and monitoring arrangements to prevent pupils/students accessing or viewing harmful or inappropriate content.
- understands the unique risks associated with online safety - including the increasing risks associated with artificial intelligence (AI) - and ensures that central staff are trained to have the requisite knowledge and up to date capability to keep children safe whilst they are online (if appropriate).
- ensures that reporting arrangements are in place so that all safeguarding and child protection concerns identified by the Trust's ICT filtering and monitoring systems are reported to the DSL or a deputy; in order that any such concerns are addressed in a timely and appropriate way in order to safeguard pupils and promote their welfare.
- understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 in respect of safeguarding children.
- ensures that the child protection policy and procedures are reviewed and updated at least annually, working with the Trust community regarding this.
- liaises with the nominated Trustee with responsibility for Safeguarding
- ensures that all members of the senior leadership team read *Keeping Children Safe in Education 2026*, as specified on page 7 of that guidance.
- informs the headteacher (of each school) of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations. This includes ensuring that the headteacher and all relevant staff are aware of the requirement for children to be accompanied by an Appropriate Adult should they need to be interviewed by the Police (please refer to [PACE Code C 2019 \(accessible\) - GOV.UK](https://www.gov.uk/government/publications/pace-code-c-2019) (www.gov.uk)).
- keeps a record of central staff attendance at child protection training and ensures that all certificates (or copies) providing evidence that staff have attended any external safeguarding courses are readily available for inspection.
- makes the child protection policy available publicly on the Trust website.
- ensures parents are aware of the Trust and school's role in safeguarding and that referrals about suspected abuse, exploitation and neglect may be made.
- ensures that the headteachers are aware of their responsibility under Working Together 2026 to refer to the Local Authority Designated Officer (LADO) in the Local Authority all allegations about the conduct of a member of staff, volunteer or anybody else working with children on school premises or on school business that meet the harm threshold as defined in Part 4 of KCSiE; within one working day prior to any internal investigation.
- ensures that the headteachers are aware of their responsibility under the Protection of Freedoms Act 2012 to refer to the Disclosure and Barring Service (DBS) whenever a decision is made to stop using the services of an individual (including supply staff and individuals not employed by the Trust/School but working with children on school premises subject to a hiring or rental agreement) because they are considered to be a risk to children.

The Deputy Designated Safeguarding Lead(s)

are appropriately trained (including Prevent and online safety training including ICT filtering and monitoring arrangements) to the same standard as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. The role and responsibility

are explicit in all role holders' job descriptions. In the event of the long-term absence of the DSL, the deputy will assume all the functions of the DSL as above.

The Board of Trustees

- Has a strategic leadership responsibility for the Trust's central safeguarding arrangements; **must** comply with its duties as defined in statutory guidance *Keeping Children Safe in Education (DfE 2026)*; and **must** have regard to that guidance, ensuring policies, procedures and training in the Trust are effective and comply with the law including the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty) at all times.
- Facilitates a central Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development; and that ultimately, all systems, processes and policies operate with the best interests of children at their heart.
- Ensures that systems which are well promoted, easily understood and easily accessible for pupils/students are in place for them to report abuse confidently, knowing that their concerns will be treated seriously, and knowing they can safely express their views and give feedback. (following individual procedures in schools)
- appoints a Designated Safeguarding Lead who is a senior member of staff from the Trust leadership team who undertakes training appropriate to the role and is given the additional time, funding, training, resources, and support needed to carry out the role effectively.
- ensures that the DSL role is explicit in the role holder's job description (and also the job description of any Deputy Designated Safeguarding Leads) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of central staff.
- ensures that the Trust has policies and procedures in place in order to safeguard and promote children's welfare (both face to face and online). Individual school policies will include an effective child protection policy; a behaviour policy which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying); a staff behaviour (code of conduct) policy and appropriate safeguarding arrangements to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods; and that all of those policies are consistent with local and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.
- ensures that each school's child protection policy reflects the whole school approach to child-on-child abuse, describes procedures in accordance with government guidance and refers to locally agreed multi-agency safeguarding arrangements put in place by the Safeguarding Partnership.
- ensures the central child protection policy is reviewed at least annually and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt; and that the most up-to-date version is available publicly either via the Trust.
- develops an induction strategy that ensures all central staff, including the CEO, temporary staff and volunteers, are provided with copies of or access to Part one of *KCSiE*, this child protection policy, the staff behaviour (code of conduct) policy, and the role and identity of the DSL and deputy DSL's as part of their induction before they start work at the Trust. Central staff will also have access to all school based policies relating to safeguarding procedures.
- ensures that the DSL or a Deputy DSL are always available during school hours for staff to discuss any safeguarding concerns. The DSL or a Deputy DSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone and/or Microsoft Teams/ZOOM/Skype or other such media. In the absence of all 4 Trust DSL's all schools have their own lead and deputy DSL's that can be contacted.
- ensures that the DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of term activities; and that staff are aware

that in the unlikely event of the DSL and all deputy DSL's not being available, they should speak to a member of SLT in one of the schools and/or take advice from local Children's Social Care if they are concerned about a child's safety.

- ensures that child protection files are maintained as set out in Annex B of *Keeping Children Safe in Education 2026*.
- ensures that the Trust follows safer recruitment procedures and maintains the single central record in accordance with Part 3 of *Keeping Children Safe in Education 2026*.
- ensures that the Trust has procedures for dealing with allegations of abuse made against and 'low level concerns' about the conduct of staff, volunteers, trainee teachers and visiting professionals (encompassing any breach of the staff behaviour policy); including allegations made against and 'low level concerns' about the conduct of the CEO.
- develops a training strategy that ensures all staff, including the CEO, temporary staff and volunteers, receive appropriate and regularly updated safeguarding and child protection training (including online safety, incorporating an understanding of the expectations, applicable roles and responsibilities in relation to the school's ICT filtering and monitoring arrangements and reporting system); and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with any requirements of the SP. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- ensures that the DSL has contact details for and liaises with the Virtual School Headteacher in the local authority as part of promoting the education of children who are looked after, were previously looked after and/or have a social worker.
- ensures that the Trust contributes to inter-agency working and plans.
- as part of ensuring staff undergo regular updated safeguarding training are integrated, aligned and considered as part of the whole Trust safeguarding approach and wider staff training.
- ensures the Trust has appropriate filtering and monitoring systems in place in order to limit exposure to illegal, harmful and inappropriate content, contact, conduct and risks such as online gambling, inappropriate advertising, phishing and or financial scams via the Trust's IT system; and participates through a nominated Trustee in an annual written review of the effectiveness of those systems with reference to a self-assessment using a reputable mechanism that confirms filtering is working on all internet-connected devices in all locations where devices are used by staff or pupils.
- ensures that the SLT, DSL and all DDSLs have an awareness and understanding of the filtering and monitoring systems, manage them effectively and know how to escalate concerns when they are identified.
- ensures that all Trustees and Governors receive mandatory safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the Trust are effective and support the delivery of a robust approach to safeguarding. Their training will be updated regularly.
- nominates a member (normally the chair) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the CEO.
- identifies a named Trustee to take leadership responsibility for the school's safeguarding arrangements. That Trustee will maintain regular contact with the DSL and will ensure that the Board of Trustees receive regular reports about safeguarding activity at the central Trust.
- ensures that the Trust's safeguarding, recruitment and allegations management procedures take into account the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.
- The Board of Trustees will have oversight that schools have completed the annual safeguarding audit, that an action plan has been drawn up and any weaknesses rectified in accordance with that plan.

The CEO:

- ensures that the child protection policy and procedures are understood and implemented

by all central staff.

- allocates sufficient time, training, support and resources, including cover arrangements, when necessary, to enable the DSL and deputy DSLs to carry out their roles effectively, including participation in inter-agency meetings under the auspices of local safeguarding procedures set by the Safeguarding Partnership.
- supports school leaders to promote the educational achievement of any pupils who are looked after by the Local Authority; and who have left care through adoption, special guardianship or child arrangement orders or were adopted from state care outside England and Wales; and have a social worker.
- Supports school leaders to ensure that all staff have the skills, knowledge and understanding necessary to keep looked after children, previously looked after children and children with a social worker safe.
- ensures that all central staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedure.
- ensures that the culture of the Trust supports the provision of effective pastoral care, community-based early help and co-ordinated support through the local Family Help process for pupils/staff with additional needs.
- ensures that staff do everything they can to support social workers when Children's Social Care become involved.
- Supports school leaders to provide effective preventative education by teaching pupils about child-on-child abuse; healthy and respectful relationships; misogyny/misandry; grooming; online safety including online harms and risks linked to artificial intelligence; how to identify risk; how to get help when they need it; and other topics as specified in paragraphs 156-166 of *Keeping Children Safe in Education 2026* as part of a broad and balanced curriculum; and that children with particular needs such as those who are known to be vulnerable, those who have experienced abuse, exploitation or neglect and those with SEN/D are provided with an appropriately customised safeguarding curriculum.
- in partnership with the DSL and Trust HR team, ensures that the Trust follows safer recruitment procedures and maintains the single central record in accordance with Part 3 of *Keeping Children Safe in Education 2026*.
- refers to the Local Authority Designated Officer (LADO) all allegations about the conduct of a member of staff, volunteer, trainee teacher or anybody else working with children on trust/school premises or on trust business that meet the harm threshold as defined in Part 4 of KCSiE; within one working day prior to any internal investigation.
- refers to the Disclosure and Barring Service (DBS) whenever a decision is made to stop using the services of an individual (including trainee teachers, supply staff and individuals not employed by the Trust but working with children on Trust premises subject to a hiring or rental agreement) because they are considered to be a risk to children, as required by the *Protection of Freedoms Act 2012*.
- appoints a case officer - who will usually be a member of the senior leadership team - to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.
- records and responds to all 'low level concerns' about the conduct of staff and volunteers (encompassing any breach of the staff behaviour policy) in a timely and proportionate manner, taking advice from the LADO and the Trust HR provider as appropriate.

Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards pupils, we identify standards of good practice and set out our expectations of staff in the staff behaviour (code of conduct) policy, which all central staff and volunteers are required to read and sign before starting work in the Trust. In summary, our expectations of staff include:

- treating all pupils with respect;
- setting a good example by conducting themselves appropriately;
- involving pupils in decisions that affect them;

- encouraging positive, respectful and safe behaviour among pupils;
- being a good listener;
- being alert to changes in pupils' behaviour and to signs of abuse, exploitation and neglect;
- recognising that challenging behaviour and mental health difficulties may be an indicator of abuse, exploitation or neglect;
- reading and understanding the school's child protection policy, staff behaviour (code of conduct) policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, criminal and sexual exploitation, extremism, online safety and information-sharing;
- asking the pupil's permission before initiating legitimate physical contact, such as assisting with dressing, physical support during PE or administering first aid;
- applying the use of reasonable force and physical intervention only as a last resort and in compliance with school procedures and SP guidance;
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language;
- not participating in, tolerating or dismissing sexual harassment or sexual violence as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- making clear that sexual harassment and sexual violence are not acceptable, will never be tolerated and are not an inevitable part of growing up;
- challenging behaviours (potentially criminal in nature) which constitute sexual harassment, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts;
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse and exploitation;
- referring all concerns about a pupil's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care;
- following the Trust/school's rules regarding communication and relationships with pupils, including via social media; and
- referring all allegations against members of staff, trainee teachers, volunteers or other adults that work with children and any concerns about staff conduct which breaches the Staff Behaviour (code of conduct) policy directly to the CEO or headteacher of that school; and any similar allegations against or concerns about the headteacher directly to the CEO.

Abuse of position of trust

All Trust central staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the trust/school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

Support before statutory intervention including school-led early support and targeted family help

Keeping Children Safe in Education 2026 highlights that school staff are in a position to identify concerns about children at an early stage, help them, promote their welfare and prevent concerns from escalating. The Trust supports all staff in our schools to actively support early intervention and offer appropriate support mechanisms. All schools have detailed information regarding their procedures included in their child protection policy –

available on the Trust website. The Trust is committed to working in partnership with children, parents and other agencies.

Children who are questioning their gender

The Trust recognises that a small but significant number of children question the way they feel about being a boy or a girl, including the physical attributes of their sex, clothing, interests and the ways in which they fit into the wider world. The Trust understands how difficult that situation is for a child and is committed to supporting any pupil who is questioning their gender. The Trust will not tolerate bullying, harassment or discrimination. All school have detailed information regarding their support and procedures included in their child protection policy – available on the Trust website.

Children with special educational needs, disabilities or physical health issues

Children with special educational needs and/or disabilities (SEND) or certain medical or physical health conditions are more vulnerable to abuse, exploitation and neglect and can face additional safeguarding challenges both online and face-to-face. Additional barriers can exist when recognising abuse, exploitation and neglect experienced by this group of children. All staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded. All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Safeguarding children with medical conditions

The school will safeguard, promote the welfare and meet the needs of children with medical conditions with reference to statutory guidance [Supporting pupils with medical conditions at school - GOV.UK](#) (DfE 2015); Allergy safety in schools - [Allergy safety in schools - GOV.UK](#) DfE 2026; and, for children aged 0-5 years, section 3 of the [EYFS statutory framework for group and school-based providers](#) (DfE 2025).

Staff will manage incidents relating to a child's medical condition (including allergies) in accordance with that guidance. All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Children with mental health needs

The Trust recognises the important role it has to play in supporting the mental health and wellbeing of pupils. All staff are trained to be aware that mental health problems can, in some cases, develop into safeguarding concerns which could include self-harm, signs of an eating disorder, suicidal ideation or suicide; and could also be an indicator that a child has suffered, is suffering or is at risk of suffering abuse, exploitation or neglect. All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

If there is reason to believe the child is in danger, the Trust will contact emergency services by calling 999 immediately; and/or arrange for the child to be taken to A&E immediately by a parent/carer or other suitable person. If the situation is not an emergency but the child needs urgent help with their mental health, the DSL will ensure that an appropriate member of staff (e.g. the senior mental health lead) contacts NHS via NHS 111 online; or by calling 111 and selecting the mental health option.

Attendance

We recognise that full attendance at Trust is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Children who are absent from school or missing from Education

The Trust operates in accordance with statutory guidance *Working together to improve school attendance* (DfE 2024) -

[Working together to improve school attendance](#)

and additional guidance - [Children missing education: statutory guidance for local authorities and schools](#) - GOV.UK (DfE 2025)

All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Attendance, absence and exclusions are closely monitored and the Trust actively supports school staff to fulfil their duties.

Children who run away or go missing from home or care

The Trust recognises that children who run away, go missing (particularly repeatedly) and are thus absent from their normal residence are potentially vulnerable to abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It could also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care (DfE 2014) requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI) within a period of 72 hours of their return. All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Helping children to understand and recognise risk, identify available support and report abuse

As part of the Trust/School's approach to safeguarding, *Keeping Children Safe in Education* 2026 requires the Board of Trustees/Governing bodies to "ensure that children are taught about how to keep themselves and others safe, including online" as part of preventative education that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

The school's system to support and enable children to report abuse

The Board of Trustees/Governing bodies are also required to ensure that there are systems in place that are "well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously." All school have

detailed information regarding their procedures included in their child protection policy – available on the Trust website. Central staff will follow the procedures of each school whilst onsite and will familiarise themselves with their processes and procedures.

Bullying, child-on-child abuse and harmful sexual behaviour

Bullying

This Trust believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other pupils in the school. *KCSiE 2026 states that "Bullying has a detrimental impact on young people's mental health and their ability to thrive at school and college. Bullying can affect a child's attainment and wellbeing. We are clear that all forms of bullying, for whatever reason, are unacceptable. Schools and colleges must take a strong, proactive stand against all forms of bullying, and schools and colleges should tackle bullying at the earliest opportunity to prevent it from escalating"; and that All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap."*

All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Child-on-child abuse

Staff are trained and expected to be aware that children can abuse other children (often referred to as child-on-child abuse, which includes bullying, harassment and violence); that it can happen both inside and outside of school and online; to recognise the indicators and signs of child-on-child abuse; and to identify it and respond to reports by pupils about themselves or other children as they would with any other safeguarding issue.

All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Online concerns can be especially complicated. Support is available from **The UK Safer Internet Centre** at 0344 381 4772 and helpline@saferinternet.org.uk and the **Internet Watch Foundation** at <https://www.iwf.org.uk/>.

Depending on the nature of the allegation, the DSL will share information about a child from another school with Children's Social Care, the Police, the headteacher (for sharing with the LADO as necessary) and/or the DSL in the other child's school.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected behaviour to inappropriate, problematic, abusive and violent behaviour. Problematic, abusive and violent sexual behaviour is developmentally inappropriate, may cause developmental damage and is referred to as 'Harmful sexual behaviour' (HSB), which can occur online, face to face or both simultaneously.

All school have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

For more information about harmful sexual behaviour please refer to: [Sexual Behaviour in Children | NSPCC](#) and <https://www.brook.org.uk/education/sexual-behaviours-traffic-light-tool/#:~:text=Brook's%20nationally%20recognised%20Sexual%20Behaviours,sexual%20behaviours%20in%20young%20people>.

Sexual harassment and sexual violence

As with bullying, all other forms of child-on-child abuse and wider safeguarding issues, staff are trained and expected to maintain an attitude of '**It could happen here**' in relation to the possibility of sexual harassment and sexual violence happening in this Trust/School. It is important that **all** victims are taken seriously and offered appropriate support; and that **any** report of sexual harassment or sexual violence is taken seriously.

All schools have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

Sharing of nude and semi-nude images and videos

The school recognises that all incidents of pupils creating and sharing nude or semi-nude images of themselves or other children (whether consensual or non-consensual) require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability. While it is acknowledged that the creation and sharing of indecent images and/or videos (including those generated by the use of AI) is a criminal offence, it is important to avoid criminalising young people unnecessarily. The school's primary concern at all times will be the welfare and protection of the children involved. The school will work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

The school will act in accordance with advice endorsed by DfE [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK](#) (UK Council for Internet Safety 2024) -

Pupils being coerced or pressurised by other children to create and share such images is a form of sexual harassment; and can also be part of a wider process of child-on-child abuse, grooming, criminal and/or sexual exploitation.

However, the school also recognises that children and young people's motivation for sharing nude and semi-nude images and/or videos can also include flirting, developing trust in a romantic relationship, seeking attention, for a 'joke' or because they are too young to understand the risks involved in doing so.

Although technically an offence, such sharing of that kind of material is referred to as 'experimental' and it is usually not necessary or appropriate to criminalise young people in those circumstances.

Although there are clear risks associated with such behaviour and those children are likely to need support, it is unlikely they have any intention to cause harm or distress to anybody; whereas children and young people who have been pressured to share nude and semi-nude images are more likely to report negative consequences.

The UKCIS guidance named above highlights that "*Addressing sensitive issues promotes a whole setting approach to safeguarding, giving children and young people the space to explore key issues and the confidence to seek the support of adults should they encounter problems. It is important to recognise how difficult it may be for children and young people to challenge or deny their peers' requests for images, especially those to whom they are attracted or whose approval they seek. It may also be extremely difficult for them to ask adults for help. Children and young people may have made a decision they are worried about and may find it difficult or embarrassing to ask for help. It is essential that lessons help children and young people develop the confidence they may need to put their skills and strategies into action*".

This school is committed to providing an emotionally safe learning environment in order for children to be able to explore issues and ask staff for help when they need it. Staff are

trained and expected to respond to disclosures of concern about sharing nude or semi-nude images and/or videos in the same way they respond to all other disclosures of child protection issues, as set out in this policy.

The school also recognises that a child's circumstances, background or sexuality may make them additionally vulnerable to wanting to share nude and semi-nude images and/or videos consensually and/or to being pressured, manipulated or coerced into doing so. Those factors may include:

- being in care;
- having special educational needs or a disability;
- having been a victim of abuse, exploitation or neglect;
- having less direct contact with parents;
- lacking positive role models at home.

Where there are wider concerns about the care and welfare of a child who has shared indecent images of themselves or other children, consideration will be given to referring to Children's Social Care.

Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff. In addition to reporting disclosures, staff are expected to report any evidence or suspicion about pupils sharing nude and semi-nude images and/or videos with other pupils - or anybody else outside the school - to the DSL, as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether any such issue is serious enough to warrant a report to the DSL. What may seem like a less serious concern to an individual member of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about the possible sharing of indecent images of children in relation to a device in the possession of a pupil (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated). This is consistent with DfE advice *Searching, Screening and Confiscation - Advice for schools (DfE 2022)*, page 17 'Items found as a result of a search':

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching_Screening_and_Confiscation_guidance_July_2022.pdf

Staff are trained and expected not to look at or print any indecent images; but to pass the confiscated device to the DSL (or a deputy) immediately (see 'Viewing the imagery' below).

When concerns are identified, the DSL will discuss the concerns with appropriate staff and speak to children involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving them would put the young person at risk of significant harm.

In the event of a young person requesting that the school does not inform her/his parents/carers about an incident involving the sharing of nude or semi-nude images of themselves or other children, the DSL will need to consider issues in relation to Gillick competency and the Fraser guidelines in making a judgement – see links above.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm, a referral will be made immediately to Children's Social Care and/or the Police.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts. Children under the age of 13 are unable to consent to sexual activity so any imagery depicting under 13-year olds will therefore also be referred to the Police.

With reference to definitions in '*Sharing nudes and semi-nudes: advice for education settings working with children and young people*' as above, the DSL will make a judgement about whether a reported incident of sharing nude and semi-nude images and videos is 'experimental' or 'aggravated'.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of nude and semi-nude images and videos of children produced by children (i.e. under 18-year olds). These include the involvement of adult offenders, e.g. adults attempting to develop relationships by grooming children and young people and/or soliciting children to create and send indecent images to them; criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, deception or exploitation; malicious conduct arising from personal conflicts such as break-ups or fights among friends; coercion; an imbalance of power, e.g. an older student pressurising a younger or vulnerable student to create and share an indecent image; or reckless creation, sending or showing of images without the knowledge or against the will of a young person who is pictured, causing that young person harm.

Examples of aggravated incidents include:

- evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim);
- evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves;
- pressure applied to a group of students (e.g. all female students in a class or year group) to create and share indecent images of themselves;
- pressurising a student who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves;
- dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation);
- what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent;
- sharing of indecent images places a young person at immediate risk of harm, for example the young person is presenting as suicidal or self-harming.

Where there are abusive and/or aggravating factors, the school will always refer incidents to the Children and Families Front Door for advice about whether or not a response by the Police and/or Children's Social Care is required. This will facilitate consideration of whether:

- there are any offences that warrant a Police investigation;
- child protection procedures need to be invoked;
- parents/carers require support in order to safeguard their children;
- a Multi-Agency Child Exploitation (MACE) meeting is required;
- any of the perpetrators and/or victims require additional support. This may require the initiation of the Early Help Pathway to Change process and the offer of early help services.

The DSL will make a judgement about whether or not a situation in which the non-consensual sharing of nude or semi-nude images and/or videos within a small number of children in a known friendship group with no previous concerns constitutes an aggravated incident; or whether the school is able to contain the situation in partnership with all parents/carers of the pupils involved, arrange for the parents to ensure that all indecent images are deleted and that the children involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the Police and/or Children's Social

Care through the Children and Families Front Door to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

Viewing the imagery - adults should **not** view nude or semi-nude images of children unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

The DSL will take advice from Children's Social Care and/or the Police and will never view nude or semi-nude images of pupils unless specifically advised to do so by a local authority social worker or Police officer with a view to ascertaining the nature of the image. If so advised, the DSL will only view the image if it is established that viewing:

- is the only way to make a decision about whether the Police and/or Children's Social Care need to intervene (i.e. it is not possible to establish the facts from the young people involved);
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent or carer in making a report;
- is unavoidable because a young person has presented an image directly to a staff member or nude or semi-nude images or videos have been found on a school device or network.

If it is necessary to view the imagery then the DSL will:

- never copy, print, share, store or save the image(s) because to do so is illegal. If that has already happened, the Police will be contacted for advice and to explain the circumstances;
- discuss and agree the decision to do so beforehand with the *headteacher/principal* and only after being asked to view the image by a social worker or Police officer;
- ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the headteacher;
- ensure viewing takes place with another member of staff present in the room, ideally the headteacher, another DSL or a member of the senior leadership team. The other staff member does not need to view the image/s;
- wherever possible, ensure viewing takes place on school premises, ideally in the headteacher or DSL's office;
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery;
- record how and why the decision was made to view the imagery in the pupil's safeguarding record, including who was present, why the nude or semi-nude images were viewed and any subsequent actions. Ensure the record is signed and dated and meets any appropriate wider standards, e.g. such as those set out in statutory safeguarding guidance and SP policies and procedures;
- if any devices need to be taken and passed onto the Police, the device(s) will be confiscated and the Police will be called. The device will be disconnected from Wi-Fi and data and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device(s) will be placed in a secure place, for example in a locked cupboard or safe, until the Police are able to collect it from school.

Deletion of images - if the school has decided that other agencies do not need to be involved, then consideration will be given in consultation with parents/carers to deleting nude and semi-nude images and videos of children from devices and online services to limit any further sharing of the images/videos.

Support for pupils, families and staff involved in a child protection issue

Child abuse, exploitation and neglect are devastating for the child and can also result in distress and anxiety for staff who become involved. The Trust will offer guidance to school leaders to enable them support to pupils, their families, and staff so that they will:

- taking all suspicions and disclosures seriously;
- nominating a link person (*usually the DSL*) who will keep all parties informed and be the central point of contact;
- when a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

Complaints procedure

Our complaints procedure will be followed when a pupil or parent raises a concern about poor practice towards a pupil that initially does not require a safeguarding response. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints regarding Trust central staff are managed by the CEO, other members of the senior leadership team and Trustees.

Complaints from central staff are dealt with under the Trust's complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under the Trust's child protection procedures.

Staff reporting concerns about a colleague or other adult who works with children (Whistleblowing)

Staff who are concerned about the conduct of a colleague or any adult working in, with or on behalf of the Trust towards a child are undoubtedly placed in a very difficult situation. Those adults include trainee teachers, visiting practitioners; temporary staff; governors; trustees; volunteers; employees/volunteers working in premises/locations that the Trust/schools use for offsite/residential visits and activities; and adults/volunteers working with children on school premises on behalf of a provider/organisation subject to a hiring or rental agreement. Staff may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague or other practitioner's career. All staff must remember that the welfare of the child is paramount.

The Trust's **whistleblowing** procedure enables staff to raise concerns or allegations in relation to any colleague or adult as listed above, initially in confidence, and for a sensitive enquiry to take place.

Staff are trained and expected to report **all** concerns (including concerns that arise online and offsite) about poor practice or possible child abuse, exploitation or neglect by adults who work with children in or on behalf of the Trust/Schools to the CEO to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse in the Trust. Those

concerns include allegations of concerns that may meet the harm test as defined in *Keeping Children Safe in Education* 2026; and also anything – both serious and seemingly minor - contraventions of the Trust's staff behaviour policy (code of conduct), referred to in *KCSiE* 2026 as 'low level concerns'.

There is no single way in which staff are required to report concerns of this nature. The most important thing is that the concern is brought to the attention of the CEO or in the case of the CEO the Chair of Trustees.

However, *KCSiE* 2026 states that all concerns including '*low-level concerns*' should be recorded in writing, to include the details of the concern, the context in which they arose and the action taken; and that the name of the individual sharing their concerns should also be noted but that if the individual wishes to remain anonymous then that should be respected as far as is reasonably possible.

NB The term '*low-level concern*' does not mean that the concern is insignificant: it simply means that the behaviour towards a child may not be deemed to meet the harm threshold or require referral to the Local Authority Designated Officer (LADO).

To facilitate staff recording any such concerns about poor practice or possible child abuse by colleagues or other adults who work with children, e.g. the Trust uses pro forma 'Logging A Concern about the behaviour of an adult who works with children' on CPOMS Staff Safe or a yellow form but staff should always be reminded that the filling in of a form (online) should never prevent concerns being reported to the CEO or if in relation to a member of staff in a school the Headteacher– in other words, if staff prefer to report to the CEO or Headteacher verbally in the first instance, their concern will still be valid and should be accepted by the CEO or Headteacher; although the CEO or Headteacher may exercise their prerogative to ask the member of staff to make a written record if they consider that necessary.

All such forms/concerns relating to members of staff in schools should be **passed directly to the headteacher.**

All forms or concerns relating to Trust central staff **should be reported to the CEO.**

Concerns or complaints about a **headteacher should be reported to the CEO**

Concerns or complaints about the **CEO should be reported to the Chair of Trustees.**

Staff may also report concerns about suspected abuse, exploitation or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard children. **Staff can also contact the Local Authority Designated Officer (LADO)**, who is responsible for the co-ordination of responses to allegations against people who work with children (see criteria, contact and referral details in section 18 below).

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or e mail help@nspcc.org.uk. Information is also available on the NSPCC website at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>.

Contact numbers for the CEO/Chair of Trustees/ LADO, Children's Social Care and the Police; and the NSPCC whistleblowing helpline are all available in the Central team Shared area on the computer under safeguarding contacts.

N.B. Staff are also encouraged to feel confident to self-refer to the CEO/Headteachers if they have found themselves in a situation that could be misinterpreted or might appear compromising to others; or, on reflection, they recognise that their behaviour might be deemed to have contravened the staff behaviour (code of conduct) policy and/or to have fallen below expected professional standards.

Managing allegations against staff

When an allegation is made against a member of staff (including trainee teachers, supply staff, volunteers and contractors), set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Part 4 of *Keeping Children Safe in Education 2026* and para 1.0.9 of Warwickshire SP multi-agency safeguarding procedures. Allegations against staff or volunteers – [Allegations Against Staff or Volunteers](#) Birmingham - <https://lscpbirmingham.org.uk/working-with-children/lado>

As required by *Keeping Children Safe in Education 2026*, all allegations in respect of an individual who works (permanently or temporarily) or volunteers at the Trust/Schools that fulfil any of the following criteria (the harm test) will be reported to the Local Authority Designated Officer (LADO) within one working day:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The LADO team's contact number is Warwickshire 01926 745376. Referrals to the LADO will be submitted on a Position of Trust Referral Form and sent to lado@warwickshire.gov.uk

Birmingham - The LADO Administration Team can be contacted on 0121 675 1669. All referrals to LADO need to be made via ladoteam@birminghamchildrenstrust.co.uk

All allegations against former members of staff or volunteers that meet the criteria will also be referred to the LADO in the first instance. On occasions, the LADO may not be able to advise about and/or co-ordinate the response to historical allegations because the current whereabouts of the former member of staff or volunteer are unknown and/or it is unknown whether the individual is currently employed or volunteering in a role involving work with children. In any such circumstances and following advice from the LADO, the matter will be reported to the Police. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended when this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the school will provide support and a named contact for the member of staff.

Staff, parents and Trustees are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. In accordance with *Keeping Children Safe in Education 2026*, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

NB it is the CEO's responsibility to contact and refer to the LADO when necessary. The only exceptions are when the allegation is against the CEO, in which instance the Chair of Trustees will undertake that responsibility; or when a member of staff is concerned that appropriate action has not been taken by the headteacher/ CEO/ Chair of Trustees in relation to an allegation against somebody who works at the school/ Trust or feels anxious about reporting to those individuals, in which instance the member of staff should contact the LADO directly in order to safeguard children. The LADO's contact details are above and

are readily accessible and visible to staff within the Central team shared area under safeguarding contacts.

In the event of a member of permanent or temporary staff, volunteer or contractor being dismissed or removed or a trainee teacher's placement being terminated due to safeguarding concerns or they would have been had they not resigned, the Trust will fulfil its legal duty to make a referral to the Disclosure and Barring Service (DBS). Failure to refer when the criteria are met is a criminal offence.

Furthermore, when a permanent or temporary teacher is dismissed or the Trust ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the Trust must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

Managing 'low level concerns' about staff conduct (including trainee teachers, supply staff, volunteers and contractors)

Upon receipt of an allegation or concern about a member of staff's conduct that is in breach of the staff behaviour (code of conduct) policy but may not meet the harm test as above (defined in *Keeping Children Safe in Education 2026* as a 'low level concern'), the Headteacher/CEO/ Chair of Trustees will have a decision to make about an appropriate and proportionate response in order to maintain the Trust/Schools as a safe environment for pupils/students to learn and staff to work in.

In the event that the Headteacher/CEO/Chair of Trustees are not certain whether or not the allegation/concern meets the harm test, they will always contact the LADO for advice.

Once it has been established that the allegation or concern does not meet the harm test, actions are likely to include one or more of the following:

- Seeking advice from the Trust's HR advisor about whether or not the allegation/concern warrants action including the possibility of an internal investigation subject to the school's disciplinary or capability procedures. That will include establishing whether or not it is necessary and proportionate to suspend the member of staff in the first instance in order to maintain the integrity of any investigation.
- If the allegation/concern does not warrant formal action or investigation, speaking to the member of staff and any other individuals as necessary to clarify the nature of the issues.
- Providing the member of staff with informal management advice. A written record of that advice will be made, shared with the member of staff and placed on their personnel file subject to HR advice and the Trust's record retention policy.
- Consideration of the need to amend Trust policies, procedures and staff training; and/or briefing all staff to remind them of relevant aspects of Trust policies with particular reference to the staff behaviour (code of conduct) policy.

The Headteacher/CEO will maintain a log of all identified 'low level concerns'. The log, all written records of 'low level concerns' and the response to them will be retained securely in accordance with the requirements of *Keeping Children Safe in Education 2026* and in compliance with the Data Protection Act 2018.

Low-level concerns about external staff including supply staff, other third-party providers and contractors **will** be notified to their employers (and in respect of trainee teachers, to their teacher training provider) so that any potential patterns of inappropriate behaviour can be identified; but the school will take responsibility for undertaking any investigation of

concerns that arise within the Trust or in the conduct of offsite Trust business.

Staff training

It is important that all staff have training to enable them to recognise when a child is upset, worried, anxious or in any way different from their usual presentation as a foundation for their understanding of the possible signs of abuse, neglect, exploitation and radicalisation both within and outside home environments; and to know what to do if they have a concern.

New staff, trustees/governors who will have direct contact with children and volunteers will receive an explanation during their induction which will include:

- the Trust/School's child protection policy
- signs and symptoms of abuse, exploitation and neglect
- online safety, including staff responsibilities in relation to the school's ICT filtering and monitoring arrangements
- 'children' includes everyone under the age of 18
- child-on-child abuse
- extra-familial harms including criminal and sexual exploitation; county lines; trafficking and modern slavery; honour and faith-based abuse; serious violence; domestic abuse within intimate teenage relationships (including physical, sexual and emotional abuse; stalking, criminal and financial exploitation); and radicalisation;
- responding to disclosure of abuse, exploitation or neglect by a child
- reporting and recording arrangements including allegations against and 'low level concerns' about the conduct of staff and visiting professionals
- the staff behaviour policy (code of conduct)
- the identity and role of the DSL and all Deputy DSLs
- the importance of **always** speaking to a DSL (or a deputy) if they are ever unsure about a child's safety, welfare or any other safeguarding issue
- the school's behaviour policy
- the school's safeguarding response to children who are absent at the start or at any time of the school day.

NB all of the above will be explained **before** a new member of staff, trustee/governor or volunteer has direct contact with children in schools. The school's child protection policy, staff behaviour policy (code of conduct) and behaviour policy will be sent with the letter confirming an appointment with a written requirement that the individual reads the three policies in advance of starting work at one of the school.

The individual will then be given an opportunity to clarify any issues on their first day of work at the Trust/School and then asked to sign to confirm that they have read and understood all three policies and undertake to comply with them.

All staff, including the CEO/headteachers, volunteers and trustees/governors will receive appropriate and regularly updated safeguarding and child protection training and thematic updates including online safety as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance, this policy and any requirements of the Safeguarding Partnership.

All staff will be made aware of the increased risk of abuse, exploitation and neglect to certain groups, including children with special educational needs and disabilities, looked after children, previously looked after children, children with a social worker, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, trafficking and modern slavery, county lines activity, child-on-child abuse, sexual harassment and sexual violence in school, extremism, honour or faith-based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping children safe online.

The DSL and all deputy DSLs will attend training for newly appointed DSLs to provide them with the knowledge and skills required to carry out the role; and refresher training every two years. The DSL and all deputy DSLs will also undertake Prevent awareness training. Training will provide the DSL and all deputy DSLs with a good understanding of the DSL role, in accordance with Annex B of *Keeping Children Safe in Education* 2026 and will include the processes, procedures and responsibilities of other agencies, particularly Children's Social Care.

In addition, the DSL and all deputy DSLs will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

All governors and trustees will receive appropriate safeguarding and child protection (including online safety) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the Trust's safeguarding policies and procedures are effective and support the delivery of a robust approach to safeguarding. That training will be updated regularly (at least annually).

In addition, the CEO/headteachers (and/or other school leaders as appropriate) and at least one Trustee (usually the chair) will attend safer recruitment training and the Trust will ensure that there are at least two school leaders and/or Trustees that have attended safer recruitment training within the past three years.

Supply staff and other visiting staff will be given the Trust's **Visiting Staff Leaflet** with the relevant information included.

Safer recruitment and employment

At Central England Academy Trust, we endeavour to ensure that we do our utmost to employ only 'suitable' staff and allow only 'suitable' volunteers to work with children by complying with the requirements of *Keeping Children Safe in Education 2026* alongside the Trust/school's and the SP *Safer Recruitment* policies.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history and explains any gaps in that history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- be interviewed by a panel of at least two trust/school leaders/trustees/governors, if shortlisted.
- provide evidence of their identity and qualifications;
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
 - an enhanced DBS check and a barred list check for all employees of the Trust and all volunteers engaged in Regulated Activity;
 - an enhanced DBS check for all trustees (not including associate members), which will only include a barred list check for trustees involved in Regulated Activity;
- if offered employment, provide evidence of their right to work in the UK;

Schools are 'specified places' which means that all paid staff and all volunteers working directly with children on more than three days in a 30-day period; or overnight; (even if only once); or providing 'relevant personal care' (e.g. helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability – even if only once) or health care (care for children provided by, or under the direction or supervision of, a regulated health care professional – even if only once) will be engaged in Regulated Activity. A fuller explanation of Regulated Activity can be found in Part three of *Keeping Children Safe in Education 2026*.

The Trust will also

- ensure that every job description and person specification for roles in Trust includes a description of the role holder's responsibility for safeguarding;
- send a criminal record self-disclosure pro forma to all shortlisted candidates, who will be asked to submit the completed self-disclosure for the attention of the interview panel before the date of interview;
- explore any convictions, cautions and other relevant issues disclosed by the candidate at interview;
- consider carrying out an online search in respect of all shortlisted candidates in order to identify any information about incidents or issues of concern that is publicly available online, which the Trust might want to explore with the candidate at interview (N.B. recruitment materials will make an explicit statement about the school's policy in relation to online searches so that all applicants are fully informed. Online searches will only seek to identify information that is publicly available and will not include proactive searches of candidates' social media accounts);
- explore any issues arising from online searches with the candidate at interview;
- ask at least two value-based questions at interview for every role in Trust about the candidate's attitude to safeguarding and motivation for working with children;
- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities;
- obtain references for all shortlisted candidates, including internal candidates;
- carry out additional or alternative checks for applicants who have lived or worked outside the UK;
- ensure that applicants for teaching posts are not subject to a prohibition order issued

- by the Secretary of State;
- academies and free schools need to check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an academy or free school;
- check that governors/ trustees are not the subject of a section 128 direction made by the Secretary of State prohibiting or restricting her/him from taking part in the management of an independent school, academy or free school because a person subject to any such prohibition or restriction is disqualified from being a governor.

At least one member on each recruitment panel will have attended safer recruitment training. All new members of staff and volunteers will undergo a safeguarding induction that includes familiarisation with the Trust's child protection and safeguarding policy, staff behaviour (code of conduct) policy, schools behaviour policy, and identification of their child protection training needs.

All staff are required to sign to confirm they have received a copy of the child protection policy, staff behaviour (code of conduct) policy and behaviour policy (if based in school).

All relevant staff (teachers, teaching assistants, other classroom-based staff, lunchtime supervisors and members of the senior leadership team, and all those who work in before or after school care for children under eight) are made aware of the disqualification from providing childcare legislation (state how awareness is raised e.g. with a staff/volunteer briefing, a clause in employment contracts for new staff etc.).

The Trust obtains written confirmation from supply agencies and third-party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the Trust that the Trust would have undertaken if they were employing the individual directly; and that those individuals are suitable to work with children.

The Trust is required to obtain a copy of an enhanced DBS certificate from any agency or third-party organisation providing a member of staff to work in the Trust, irrespective of whether any matter or information is disclosed.

Trainee teachers will be checked either by the Trust or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The Trust maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of *Keeping Children Safe in Education 2026* and guidance issued by Warwickshire/ Birmingham local Safeguarding Partnership.

Volunteers

Volunteers will undergo checks commensurate with their work in the Trust and contact with pupils. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in Regulated Activity.

Supervised volunteers

Volunteers who do not undertake Regulated Activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

Contractors

The Trust checks the identity of all contractors and their staff on arrival at the site and requests evidence of DBS checks when appropriate as detailed above. As required by statutory guidance, when contractors and/or their staff are engaged in Regulated Activity,

barred list checks are also requested. Contractors and any of their staff who have not undergone checks will not be allowed to work unsupervised or in Regulated Activity.

Site security

Visitors to the Trust, including contractors, are asked to sign in and are given an identity badge, which confirms permission to be on site. All visitors are expected to observe the school's safeguarding and health and safety arrangements to ensure children in schools are kept safe. The Headteacher/CEO will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

Behaviour

The individual school's behaviour policy is set out in a separate document and is reviewed regularly by their governing body. It is shared with all staff before they start working with children as part of their induction. The policy is transparent to staff, parents and pupils.

The Trust's approach to behaviour is characterised by our wider emphasis on the importance of kindness, mutual respect and everybody's right to feel safe; and our belief that children learn how to behave safely by being supported and treated with respect by emotionally attuned adults, not by extrinsic rewards or punitive sanctions. Staff are trained and expected to model those core values through their day-to-day interactions with children and each other so that children learn by example and experience.

All schools have detailed information regarding their procedures included in their child protection policy – available on the Trust website.

School behaviour policies reference and school staff are trained to respond to incidents.

'Restrictive interventions, including use of reasonable force, in schools' (DfE 2026):

https://assets.publishing.service.gov.uk/media/6943dad6501cdd438f4cf5aa/Restrictive_interventions_including_use_of_reasonable_force_in_schools.pdf; and

'Reducing the Need for Restraint and Restrictive Intervention' (HMG):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812435/reducing-the-need-for-restraint-and-restrictive-intervention.pdf; and

Keeping Children Safe in Education 2026 highlights that there are limited circumstances when it is appropriate for staff in schools to use 'reasonable force' to safeguard children.

This can range from guiding a child to safety by the arm to more extreme circumstances such as breaking up a fight or when a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means '*using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances.*'

Searching

In accordance with DfE guidance *Searching, screening and confiscation - Advice for schools -*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching_Screening_and_Confiscation_guidance_July_2022.pdf,

school staff can search a pupil for any item if the pupil agrees but the member of staff should ensure the pupil understands the reason for the search and how it will be conducted so that their agreement is informed.

The headteacher and any member of staff authorised by the headteacher also has a statutory power to search pupils or their possessions, without consent, when they have reasonable grounds for suspecting that the pupil may have one or more of the following prohibited items in their possession: knives or weapons; alcohol; illegal drugs; stolen items;

tobacco and cigarette papers; fireworks; pornographic images; indecent images of children; any article that a member of staff reasonably suspects has been, or is likely to be, used to commit an offence or to cause personal injury to or damage to the property of any person (including the pupil).

The headteacher and authorised staff can also search for any item identified in the behaviour policy as prohibited and an item which may be searched for.

Schools have detailed information regarding searches in the child protection policy which can be viewed on the Trust website.

Record Keeping

As required by *Keeping Children Safe in Education 2026*, all concerns, discussions and decisions made about safeguarding (including early support) and promoting the welfare of pupils - and the reasons for all decisions - will be recorded in writing using CPOMS/ Green Forms and stored at the school that the pupil attends.

All such records will include:

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

The DSL will constantly monitor safeguarding records, making sure that they are clear, factual, and distinguish between observed concerns, professional opinion, and historical information.

The school will:

- ensure all safeguarding records are in a separate file for each child; separate from the child's generic school record; kept secure and in locked locations; and that electronic information is password protected;
- All written child protection and safeguarding information will be stored in a locked facility. All child protection records will only be made available to relevant individuals with a valid professional reason to see them; parents/carers subject to a subject access request; and children upon request, subject to consultation with parents/carers and partner agencies as deemed appropriate by the DSL.
- keep records in a meticulous chronological order;
- ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves;
- ensure all safeguarding records are transferred - separately from the child's main pupil file - to the receiving school, college or other education establishment when a pupil moves. The DSL will do this as soon as possible, ensuring secure transit, and will ensure that confirmation of receipt of the records is obtained.
- the DSL will also consider whether it is appropriate to share any information with a child's receiving school/setting in advance of the child leaving so that the receiving school/setting is able to support the child as effectively as possible and plan for her/his arrival (please also see next section).
- ensure that incoming safeguarding records are brought to the attention of the DSL, Deputy DSLs and other key staff such as the SENCO and designated teacher for looked after children when a child transfers in from another school/setting.

Safeguarding and child protection records will be maintained independently from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. Such records will only be accessible to the Designated Safeguarding Lead, deputy DSLs and school leaders who need to be aware.

Central staff must report any concerns regarding pupils at a school to the DSL/ Deputy DSL of that school. If they require assistance they can contact the Trust

DSL's for advice.

Staff will record any safeguarding or child protection observations or concerns about a child on CPOMS/Green Forms. All Green forms will be scanned and uploaded onto CPOMS. The same format will be used by staff to record and report any observations or concerns that suggest a child might benefit from early support or family help. Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version if the no login or access to device.

Green forms will be completed by Central staff if they do not have a login for the schools CPOMS system. These forms must be handed to a DSL in the school.

Staff are trained and expected to make a full record of all conversations with pupils relating to safeguarding concerns, whether or not the child makes some form of disclosure.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, demeanour, voice tone, facial expression, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. When possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Staff are also trained and expected to record their professional opinion/comment/reflection/ analysis of their concerns based on the facts in order to place the record in context for the DSL's future reference. Records will be signed, dated and timed by the member of staff making the record.

The DSL is responsible for ensuring that the record of all concerns, discussions, decisions made and the rationale for those decisions – including decisions about making and not making referrals to partner agencies such as children's social care, the Police or the Prevent program - provides unequivocal clarity about the nature of concerns and the action taken by the school in response to safeguard the child when the file is read retrospectively. This will also help in discussions with parents/carers about concerns, possible offers of early support or family help and/or the possible need to make referrals; and if/when responding to any complaints about the way a case has been managed by the school; or in the event of needing to share the record with partner agencies (for example in support of a referral to Children's Services or in a child protection conference); or if the record is required as evidence in any Court proceedings.

Child protection records form a part of a child's pupil record, which parents ordinarily have a right to see. Any pupil or parent wishing to access the pupil's child protection records will need to submit a subject access request in writing to the school for consideration. Access to the record will then be arranged but records may be redacted in line with the requirements of data protection laws if releasing information would place the child, or any other person, at risk of significant harm.

Confidentiality and Information Sharing

The Trust will manage and share confidential information about children in line with *Keeping Children Safe in Education 2026* and *Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (HMG 2024)*

https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_a_device_content_May_2024.pdf

All staff are trained to understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Data Protection laws place duties on the school and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

However, data protection laws do not prevent or limit the sharing of information for the purposes of keeping children safe. *Keeping Children Safe in Education* (DfE 2026) states clearly that “*Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children*”.

In making decisions about whether or not to share information about children for safeguarding purposes, the school will take particular account of the ‘**The seven golden rules for sharing information (including personal information)**’, as follows:

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. *The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.*

2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why. *You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).*

3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm. *You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.*

4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case. *Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. If staff have such concerns, they are trained to speak to the DSL or a deputy DSL. The DSL will seek advice, which may include contacting the school’s legal advisor or Children’s Social Care or following the NSPCC’s safeguarding guidance.*

5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support; and only share the information they need to support the provision of their services. *Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.*

7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information. *When a partner agency requests information from the school and the DSL decides not to share it, the DSL will explain why they chose not to do so and will reconsider their decision if the requestor shares new information that might cause*

them to regard the information the school holds in a new light. The DSL will record the rationale for their decision and be prepared to explain their reasons if they are asked. Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency as required (e.g. Children's Social Care).

It is reasonable for staff to discuss day-to-day concerns about pupils with colleagues in order to ensure that children's general needs are met in school. However, staff are trained and expected to report all child protection and safeguarding concerns (including the possible need for early support or family help) to the DSL (or a deputy DSL) or headteacher or – in the case of concerns about the headteacher – to the chair of governors. The DSL or deputy DSL receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Keeping Children Safe in Education 2026 emphasises that the DSL or a deputy DSL should always be available to discuss safeguarding concerns but in exceptional circumstances when neither the DSL nor any appointed deputy DSL is available, that should not delay appropriate action being taken and staff should speak to a member of SLT or take advice from Children's Social Care if they are concerned about a child's immediate safety.

It is essential that school staff share information with relevant agencies for the purposes of keeping children safe and promoting their welfare. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. However, when there is good reason to do so, the DSL may share information *without* consent and will record the reason for not seeking consent.

When a pupil moves to another school/setting the DSL will ensure a clear, structured written summary identifying current safeguarding concerns, relevant context and any ongoing support needs is provided. The summary will distinguish between current safeguarding concerns and historical information, ensuring that past issues are presented with appropriate context, with a concise summary of any current risks and concerns.

The DSL will also consider the need to share information with the new school/setting **in advance** of transferring the child protection file, particularly when the information would enable the new school/setting to put an immediate support plan in place for a child who has suffered abuse, neglect or exploitation, is looked after or was previously, has a social worker or is known to be vulnerable in any other way.

When an individual pupil has previously been involved in incidents indicating concerns about serious violence or harmful behaviours, proactive sharing of information with the new school/setting will also inform an assessment of risk to other pupils in the school/setting as well as the individual pupil.

When the school receives similar advance information from a previous school/setting, the DSL will ensure the information is reviewed so that key risks and needs are clearly understood. If it is identified that the information received is unclear or incomplete, the DSL will contact the DSL at the previous school/setting to seek clarification in order for the school to safeguard the pupil and other pupils effectively.

Information received from a child's previous school/setting will be used to support the child, not disadvantage them.

When the information received indicates a risk to others and/or the individual pupil, e.g. a pupil has previously carried, been threatened with, or used a knife or weapon; or has displayed harmful sexual behaviours to other pupils, a written risk assessment will be undertaken and a safety and support plan drawn up for when the child arrives.

In all such circumstances of children transferring from or to another school/setting, the DSL will speak to the DSL at the other school/setting to inform the planning of effective safeguarding of all pupils.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL, who will discuss the request with the data protection officer.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All staff must be aware that they cannot promise a child/parent to keep secrets.

All safeguarding and child protection information will be handled in line with data protection laws, which require that sensitive information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

All child protection records will only be made available to relevant individuals with a valid professional reason to see them; parents/carers subject to a subject access request; and children upon request, subject to consultation with parents/carers and partner agencies as deemed appropriate by the DSL.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

Extended school, offsite arrangements and use of school premises for non-school activities

All extended and offsite activities are subject of a risk assessment to satisfy health and safety and safeguarding requirements. When our pupils attend offsite activities, including day and residential visits and work-related activities, the school will ensure that effective child protection and whistleblowing arrangements are in place.

As per day-to-day arrangements in school, pupils will not be allowed to use toilets designated for the opposite biological sex. Children aged 11 years or older at the start of the school year will not be allowed or required to undress in front of a child of the opposite biological sex. When responding to a request to support social transition by a gender-questioning child, the school will not allow the child to access sleeping accommodation, changing rooms, showers or toilets designated for the opposite sex. If a gender-questioning child does not want to use the sleeping accommodation, changing rooms, showers or toilets

designated for their sex, the school will do everything possible to provide an alternative facility without compromising the provision of single-sex facilities, e.g. by using a separate fully enclosed room or by using existing facilities at separate times. Clear records will be made of any such situation.

When services or activities are provided by the governing body under the direct supervision or management of school staff, this child protection policy and procedures will apply.

When hiring or renting the Trust's facilities to external organisations or individuals (for example community groups, sports associations and service providers that run community or extra-curricular activities), the Board of Trustees will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures (including safer recruitment procedures) in place to keep children safe; will inspect those as necessary; and will put arrangements in place for the external body to liaise with the Trust in respect of these matters as appropriate. This applies regardless of whether or not the children who attend any services or activities provided by the external body are children on one of our school's roll.

The Board of Trustees will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; with the stipulation that failure to comply with the arrangements will lead to termination of the agreement.

The school's DSL will maintain an overview of all pupils accessing the children's club/breakfast club/wraparound provision and will ensure that robust arrangements are in place for timely and effective two-way sharing of safeguarding information - including records of all safeguarding concerns - between the school and the safeguarding lead for the children's club/breakfast club/wraparound provision.

The school's DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and swift reporting of non-attendance and children who are absent and children going missing from the children's club/breakfast club/wraparound provision at any time when they should be there. The DSL will also ensure that effective quality assurance arrangements are in place in order to monitor the ongoing effectiveness of all safeguarding arrangements that the children's club/breakfast club/wraparound provision has in place.

The Trust will refer to the code of practice *Keeping Children Safe in Out of School Settings* (DfE 2023) to identify and support groups/organisations/associations using school premises to understand the required safeguarding arrangements - see [After-school clubs, community activities, and tuition - safeguarding guidance for providers](#).

All staff are required to report any concerns about the conduct of adults using the Trust premises or involved in Trust business (including offsite and online) to the CEO in the same way they would report concerns about the conduct of Trust employees

Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse and exploit children through taking or using images, so we must ensure that we have some safeguards in place. The increasing misuse of artificial intelligence (AI) by some individuals to generate child sexual abuse images further highlights the need for those safeguards.

To protect pupils we will:

- seek their consent for photographs or video images to be taken;
- seek parental consent;
- ensure pupils are appropriately dressed; and
- encourage pupils to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or publications), we will:

- avoid naming children when possible;
- if it is necessary to name children, use first names rather than surnames;
- if children are named, avoid using their image;
- establish whether the image will be retained for further use, where and for how long;
- ensure that images are stored securely and used only by those authorised to do so.

Staff will also be trained and required to assess very carefully whether taking photographs or video images; and publishing them as above is absolutely necessary for pupils' learning and/or in their best interests (e.g. to create learning journals, to provide evidence of academic progress, to celebrate significant achievements).

For the protection of pupils and staff, only Trust/School owned equipment will be used to record and store images taken by staff or volunteers on the site or during offsite school activities including residential visits.

Individual schools have details of their parental consent for images and schools will inform all central staff of pupils who have permission.

Visiting practitioners who work directly with children are subject to the same restrictions as school/trust staff and volunteers in respect of recording and storing images of children. However, some visiting professionals are permitted to record images of the premises only, specifically for professional purposes and in order to support the school, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

Online Safety including use of mobile phones and filtering and monitoring arrangements

The Trust complies with statutory guidance [Mobile phones in schools - GOV.UK](https://www.gov.uk/guidance/mobile-phones-in-schools), which requires that pupils in all schools do not have access to their mobile phones throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

Individual schools have details included in their child protection policy which can be viewed on the Trust website. Central staff abide by school policies and procedures when onsite.

The breadth of issues within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content; for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories;
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial

advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example: making, sending and receiving explicit images, including those generated by AI and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If the school has any reason to believe that any pupil/student or member of staff is at risk from phishing, a report will be made to the Anti-Phishing Working Group (<https://apwg.org/>).

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risks to children online in the same way that they notice and report offline concerns. The Trust's **online safety policy** explains our approach to keeping pupils safe in schools and protecting and educating pupils in the safe use of technology including ways for them to report any harmful, distressing or abusive online content, contact, conduct or commercial activity.

The DSL has ultimate responsibility for ensuring that online safety, including filtering and monitoring arrangements and the school's use of generative artificial intelligence (AI), are effective in keeping children safe and ensures she/he receives all reports/alerts of safeguarding concerns arising from filtering and monitoring.

The Trust complies with the standards *Meeting digital and technology standards in schools and colleges* (DfE, updated 2024) – see <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

In accordance with those standards, the Trust has appropriate filters and monitoring systems in place to protect children from potentially harmful online material when they use trust-owned devices and access the trust's internet connection.

The Trust network operates via Oak Wood Schools filtering and monitoring system. This system operates two layers of filtering and monitoring:

1. A client installed on all computers.

- Monitors keystrokes and websites visited.
- Triggers alerts if concerning terms are typed (e.g. "suicide") Filtering and monitoring arrangements also filter/monitor key words and phrases in other community languages
- Alerts are sent via email to the Online Safety Coordinator and DSL.

2. Onsite Firewall and Content Filter – All internet traffic passes through this system.

- Filtering levels vary according to the end user, identified by login credentials.
- For unidentified users (e.g. iPad users/Guest Users), the most restrictive default filter applies.
- Filters are configured by job role, ensuring access is appropriate to responsibilities and safeguarding risks (e.g. county lines, self-harm, Prevent). Information is relayed to the Online Safety Coordinator by the HR team and/or DSLs.
- Safe Search is enabled across all filtering policies by default.
- SonicWall provides updated filter lists, informed by current risks and terminology. The Trust may also add or allow specific websites as required (e.g. banks).
- Application control restricts access to apps such as WhatsApp depending on end user, and encrypted traffic (https) is also filtered.

Devices and Usage

- Device use depends on end user, typically internet access is mainly via laptops.
- Devices are integral to the day to day activities undertaken.
- Devices taken home are subject to content filtering through a third-party application.
- Devices are for school use only.
- Staff with mobile phones connect to the school's WIFI network and usage is monitored, when connecting to the mobiles network the service providers content filtering is enabled.

Monitoring

All staff are trained to understand the importance of **proactive** physical supervision of pupils/students' use of school-owned devices and the school's ICT system in order to safeguard them from any harmful content and prevent inappropriate conduct, particularly in relation to those pupils known to be vulnerable or at risk. **The central staff team will follow the guidance outlined in the individual school's child protection policy if they have any concerns whilst working at the school site and will report these concerns to the DSL.**

- Fastvue, used alongside the content filter, provides real-time alerts when flagged keywords or websites are accessed.
- Some websites may be accessible but still trigger alerts for review.
- Monitoring is conducted internally by trained staff, including DSLs and the Online Safety Coordinator.
- User activity logs can be investigated if required, typically in response to a real-time alert.
- Logs identify users via username or device name; in limited cases, by IP address. Device locations can then be confirmed by other means.
- The majority of logs are linked directly to user credentials.

Escalation and Record Keeping

- Real-time alerts are received by DSLs and Online Safety Coordinator.
- DSLs assess alerts and determine whether further action is required, consulting the Online Safety Coordinator if necessary.
- Where appropriate, history is reviewed to assess any patterns of concern, which may trigger further investigation or further support.
- All communication, interventions, and escalations are recorded.
- .

Risk Assessment and Guidance

- The appropriateness of filtering and monitoring systems is partly informed by risk assessments undertaken in line with the Prevent Duty.
- Additional guidance is available from the UK Safer Internet Centre:
<https://www.saferinternet.org.uk/advice-centre/teachers-and-schoolstaff/appropriate-filtering-and-monitoring>

In order to safeguard pupils/students from risks associated with artificial intelligence (AI), the Trust will operate in accordance with DfE guidance [Generative artificial intelligence \(AI\) in education - GOV.UK](#); and guidance provided by the Internet Watch Foundation – <https://www.iwf.org.uk/resources/ai-generated-child-sexual-abuse-material-professionals-resource/#guides>;

The Trust also recognises the risks of cyber-crime as highlighted in KCSiE 2026 and operates in accordance with the cyber security standards – see [Meeting digital and technology standards in schools and colleges - Cyber security: core standard - Guidance - GOV.UK](#)

Safeguarding pupils accessing remote education and virtual learning including communication between staff and pupils

It is unlikely that the Trust central team would be involved in delivering remote education or virtual learning for pupils but if the need did arise the staff members would be required to follow the guidance outlined in the individual schools child protection policy.

The Trust will take account of DfE guidance [Safeguarding and remote education - GOV.UK](#) in relation to the planning and delivery of remote and virtual learning; and [Providing remote education: guidance for schools - GOV.UK](#).

In **rare and exceptional circumstances** where staff urgently need to contact a pupil or parent by telephone and do not have access to a trust/school-owned device, they will discuss this with the CEO/ headteacher. If it is agreed there is no alternative to using a personally owned device, central staff members will always use 'caller withheld' to ensure the pupil and/or parent is not able to identify the staff member's personal contact details.

Staff also receive advice regarding their personal online activity, use of social networking and electronic communication with pupils from any of the schools, about which there are strict rules as outlined in the Code of Conduct.

Staff found to be in breach of these rules may be the subject of a referral to the LADO and/or may be subject to disciplinary action.

Child protection procedures

Recognising abuse, neglect and exploitation

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

All staff are trained to understand that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify situations in which children may be in need of help or protection.

All staff are aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. All staff are trained to consider whether children are at risk of abuse or exploitation in situations outside their families including online.

Abuse, neglect and exploitation are forms of maltreatment of children (see *Child sexual*

exploitation and child criminal exploitation below). Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child alone at home without adult supervision.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Staff are trained to understand and recognise indicators of all four categories of abuse as defined below.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of their school's policy and procedures for dealing with it.

Neglect

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

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- b. protect a child from physical and emotional harm or danger;
- c. ensure adequate supervision (including the use of inadequate caregivers);
- d. ensure access to appropriate medical care or treatment; or
- e. provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions taken from *Working Together to Safeguard Children* (DfE 2026).

Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse, exploitation and neglect; and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, exploited or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for including dirty, damaged, unsuitable or ill-fitting clothing;
- smell of urine, faeces, body odour, vomit, or cannabis
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or others' safety;
- self-harm;
- miss school and/or arrive late without explanation; and/or persistently;
- show signs of not wanting to go home;
- display a change in behaviour, e.g. from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their schoolwork;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs, drug taking and/or alcohol misuse;
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development;

- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family; and/or
- appear overly anxious about receiving messages on or preoccupied with a mobile phone or other internet-enabled device

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk. Central team staff should report any concerns immediately to the DSL of the school they are working in.

Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by one or more of the following: anxiety, depression or other mental health difficulties, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships, unfulfilled potential and long-term physical health difficulties.

Taking action

Any child in any family in any school could become a victim of abuse, exploitation or neglect. Staff should always maintain an attitude of "It could happen here". That includes the likelihood that child-on-child abuse happens in every school.

Key points for staff to remember when taking action are:

- in an emergency take the action necessary to protect the child, for example, call 999;
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse or exploitation and certainly by the end of the day;
- do not start your own investigation; share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern, using CPOMS/ Green Forms (if central staff are not sure where to locate these in a school please request on from the school office and speak to the DSL); and
- seek support for yourself if you are distressed or need to debrief.

If a member of staff or volunteer is concerned about a pupil's welfare

There will be occasions when staff suspect that a pupil may be at risk without unequivocal evidence. The pupil's behaviour or normal presentation may have changed; their artwork could be unusual or bizarre; they may write stories or poetry that reveal confusion or distress; or staff may notice physical but inconclusive signs. In these circumstances, staff will try to give the pupil the opportunity to talk while remembering that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected; and/or they may not recognise their experiences as harmful.

The signs that staff notice may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. Staff are encouraged and supported to ask pupils if they are OK, if there is anything the child would like to talk to them about and if they can help in any way. Staff are trained to do this by asking appropriate open questions which do not lead the child in any particular direction but

invite the child to talk about anything if they wish to.

Staff are expected to use CPOMS or if you do not have a login the Green Forms to record these early concerns and should make a full record of all conversations with pupils relating to safeguarding concerns, whether or not the child makes some form of disclosure. If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. If the member of staff remains concerned after an initial conversation with the pupil, they should discuss their concerns with the DSL.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Support and Family Help process as detailed in the school policies.

If a pupil discloses abuse, exploitation or neglect to a member of staff or volunteer

It takes a lot of courage for a child to disclose that they are being abused, exploited or neglected. They may feel ashamed, particularly if the abuse or exploitation is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse or exploitation is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing including child-on-child abuse, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep unsafe secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen but if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

During conversations with pupils about potential safeguarding concerns, staff are trained and expected to:

- allow the child to speak freely;
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – **'I'm glad you told me'/'Thank you for telling me'; 'You're doing very well'; 'I believe you'; 'What happened to you is not your fault'/'This isn't your fault'; 'I'm going to do what I can to help you';**
- not be afraid of silences – staff must remember how hard this must be for the pupil;
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about it;
(**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. *'when did this happen?'*, *'where did this happen?'*)
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as *'I do wish you had told me about this when it started'* or *'I can't believe what I'm hearing'* may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next;
- let the pupil know that someone (either the member of staff or another named person, e.g. the DSL) will come to see them before the end of the day;
- report verbally to the DSL **immediately** (or CEO/headteacher if the child has made an allegation against a member of staff);

write up their conversation as soon as possible on CPOMS/ Green form and pass it to the DSL (or CEO/headteacher if the child has made an allegation against a member of staff, using CPOMS Staff Safe or a yellow form if you are at one of the schools; and

- seek support if they feel distressed or need to debrief.

Notifying parents

The Trust/School will normally seek to discuss any concerns about a pupil with their parents/ carers. This must be handled sensitively and the DSL will make contact with the parent/ carer in the event of a concern, suspicion or disclosure. Other staff should not notify parents/carers unless they are explicitly asked to do so by the DSL.

Our focus is the safety and wellbeing of the pupil. Therefore, if the Trust/School believes that notifying parents/carers could increase the risk to the child or exacerbate the problem or create an undue delay, advice will be sought first from Children's Social Care.

Making a referral to Children's Social Care

Keeping Children Safe in Education 2026 emphasises that the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL will make a referral to Children's Social Care (and if appropriate the Police) if it is believed that a pupil is suffering or is likely to suffer significant harm.

The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay. *Keeping Children Safe in Education 2026* also emphasises that **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Statutory assessments **Children in need**

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect; female genital mutilation or other honour or faith-based abuse; and extra-familial threats like radicalisation, sexual exploitation and criminal exploitation.

Submitting child protection referrals

All child protection referrals will be made as set out in local Safeguarding Partnership inter-agency procedures. For schools currently in our Trust this applies to Warwickshire and Birmingham. Warwickshire by telephoning Family Connect on 01926 414144. Birmingham

CASS by telephoning Monday to Thursday 8.45am - 5.15pm and Friday 8.45am - 4.15pm

Phone 0121 303 1888 and select Option 2 then Option 2

The procedures state that, when contacting Family Connect/CASS, professionals will be guided through a relational conversation with a trained advisor to ensure that concerns are fully understood and directed to the appropriate service without delay.

N.B. If a child is already the subject of an open case to Children's Social Care, the DSL will have the name and contact details of the allocated social worker. Further child protection concerns about any child in those circumstances must be referred directly to the allocated social worker, **not** to Family Connect. When there is an immediate concern about a child's safety, the DSL should contact the social worker by telephone in the first instance. Any difficulties in contacting the social worker must be escalated to their line manager, **not** to the Family Connect in Warwickshire.

Outside of office hours, immediate concerns about a child will be referred to the Warwickshire Emergency Duty Team on 01926 886922. Birmingham Emergency out of hours - Phone 0121 675 4806

Irrespective of the outcome of any discussion with Family Connect/CASS or a child's allocated social worker about a child the school believes to be at risk of significant harm, the school will confirm its concerns in writing.

If staff are ever concerned that a child is in immediate danger, they will contact the Police by dialling 999.

Staff may also seek support directly from the Family Support Worker Warwickshire Helpline on 01926 412412. Birmingham Phone 0121 303 1888 and select Option 2 then Option 2

Staff reporting directly to child protection agencies

Staff should ordinarily follow the reporting procedures outlined in this or individual school policies. However, as highlighted above, **all** staff should be aware of the early support and family help process and understand their role in it; and **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989. **Any member of staff may therefore refer their concerns directly to Children's Social Care and/or the Police if:**

- the situation is an emergency and the DSL, the deputy DSL, the CEO/headteacher and/or the chair of trustees/governors are all unavailable;
- they are convinced that a direct report is the only way to ensure the child's safety;
- for any other reason they make a judgement that a direct referral is in the best interests of the child.

In any of those circumstances, staff may make direct child protection referrals and share information without being subject of censure or disciplinary action. However, staff should inform the DSL and/or CEO/headteacher at the earliest opportunity that they have made a direct referral unless in their judgement doing so would increase the risk of harm to the child.

If in any doubt, members of staff may consult Family Connect/ CASS (details above) or via Warwickshire MASHeducationlead@warwickshire.gov.uk or triagehub@warwickshire.gov.uk.

Birmingham - CASS contact details

Monday to Thursday 8.45am - 5.15pm and Friday 8.45am - 4.15pm

Phone 0121 303 1888 and select Option 2 then Option 2

Emergency out of hours - Phone 0121 675 4806

https://www.birminghamchildrenstrust.co.uk/info/3/information_for_professionals/311/i_nee

What will Children's Social Care do?

The **Warwickshire** Safeguarding procedures state that callers to Family Connect will speak with a trained Child and Family Advisor or a social worker in the Triage Hub and enquiries will be triaged and directed to the appropriate service, ensuring a seamless process and a proportionate, timely response to children's needs. Family Connect also incorporates the Multi-Agency Safeguarding Hub (MASH), a partnership between Warwickshire County Council, Warwickshire Police, The National Health Service (NHS) and other key partner agencies.

In **Birmingham** once a referral has been received a lead practitioner will be assigned. A social worker in child protection cases. In response to the referral, the Lead Practitioner should:

Clarify with the referrer, when known, the nature of the concerns and how and why they have arisen;

Make clear to children and families how the assessment will be carried out and when they can expect a decision on next steps;

Inform the child and family of the action to be taken, unless a decision is taken on the basis that this may jeopardise a police investigation or place the child at risk of significant harm.

Children's Social Care should acknowledge receipt and make a decision about the type of response that is required within one working day of a referral being made; and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm; and whether enquiries must be made and the child assessed under section 47;
- whether the child is in need, and should be assessed under section 17 or offered support through family help;
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The Trust/School will follow up if this information is not forthcoming and if, after a referral, the child's situation does not appear to be improving, the school will consider following the SP Practitioner Escalation Protocol ([WSCP Practitioner Escalation Policy](#)) to ensure the referred concerns have been addressed and, most importantly, that the child's situation improves.

While every effort will be made to resolve concerns via informal discussion, the school will always complete the *Escalation Monitoring Form* (appendix 1 – **Warwickshire WSCP Practitioner Escalation Policy**) **Birmingham**

(<https://trixcms.trixonline.co.uk/api/assets/westmids-birmingham/ff144e00-7dfe-418a-ad56-b9b8cfa78d27/customertoaddlocaldocuments-1-.txt>) when following the Practitioner Escalation Protocol. The DSL will share the completed form with the appropriate manager in Children's Social Care and a copy will be placed on the pupil's school safeguarding file.

If Children's Social Care decide to carry out a statutory assessment, trust/school staff will do everything they can to support that assessment, led and supported by the DSL (or deputy) as required.

Extra-familial harms (contextual safeguarding)

Safeguarding incidents and/or behaviours can be associated with factors both outside children's home environments and outside school; and/or can occur between children outside the school including online. The DSL, deputy DSLs and all staff will consider the context within which such incidents and/or behaviours occur. Contextual safeguarding

means that assessments of children should consider wider environmental factors present in a child's life that are a threat to their safety and/or welfare.

The trust/school will listen to pupils, staff and parents/carers to develop its understanding of any times or locations before and after the school day when; and any locations in the locality of the school where they do not feel safe. The trust/school will also liaise with partner agencies to build further its understanding of the local context of the school to help co-ordinate a collective safeguarding response around the school day (please also refer to '*local contextual issues*' at the end of this policy).

Staff will also be vigilant about any signs or indicators that would suggest children may be at risk in the community and/or online and will share intelligence with the Police in order to prevent children suffering harm. Some extra-familial harms are likely to constitute significant harm and will therefore be referred to Children's Social Care as necessary. The school will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse or exploitation.

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Both **CSE** and **CCE** are forms of abuse that occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity

- (a) in exchange for something the victim needs or wants; and/or
- (b) for the financial advantage or increased status of the perpetrator or facilitator; and/or
- (c) through violence or the threat of violence.

All forms of child exploitation can be committed or facilitated by an organised network or gang; and the victim may identify as being part of this group. The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

CCE and CSE can affect children, both male and female, and can include 16 and 17-year olds who can legally give consent to have sex and children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.

In accordance with [Modern slavery: how to identify and support victims - GOV.UK](#), with trust/school will make both child protection and modern slavery referrals when a child is identified as a potential victim of CCE and/or CSE.

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

CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health.

It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Victims may not recognise that as trafficking when it happens to them.

Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through grooming behaviour that may include the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- a child travelling outside the area in which she/he lives in order to transport, distribute or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines** (see below);
- a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated;
- a child being forced or manipulated to shoplift or pickpocket;
- a child being forced or manipulated to threaten other young people or adults;
- a child being forced or manipulated to commit acts of serious violence;
- a child being forced or manipulated to commit some form of vehicle crime;
- a child being forced or manipulated to work in a cannabis factory;
- a child being forced or manipulated to commit crime in order to settle actual or fabricated debts;
- gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang;
- a child being encouraged or manipulated to commit crime via social media;
- a child receiving food, money, kudos or status in return for storing a weapon or drugs for others.

NB it is important for adults to be aware that both boys and girls can suffer criminal exploitation although their experience of it may be very different. Furthermore, boys and girls who suffer criminal exploitation are likely to be at greater risk of sexual exploitation.

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- children appearing with money, clothes, mobile phones, etc. without plausible explanation;
- children who associate with other young people involved in exploitation;
- children having 'boyfriends', 'girlfriends' or associations with significantly older or controlling individuals or groups;
- children frequenting areas known for sex work and/or criminal activity;
- children who associate with gangs and/or become isolated from their peers/social networks;
- children self-harming or presenting with significant changes in their emotional well-being;
- children receiving excessive texts/phone calls;
- multiple callers (unknown adults or peers) to children;
- concerning use of internet or other social media by children;
- increasing secretiveness around children's behaviours;
- children displaying sexual behaviours beyond expected sexual development for their age and/or with sexually transmitted infections and/or becoming pregnant;
- children misusing alcohol and/or other drugs;

- children returning home or arriving at school under the influence of drugs and/or alcohol;
- children who go missing for periods of time or regularly come home late; and are subsequently found in areas away from their home;
- children who regularly miss school or education, have unexplained absences or do not take part in education;
- children being exposed to, perpetrating or is alleged to be the perpetrator of serious levels of violence (e.g. knife crime); and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them (for further information see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf);
- evidence or suspicions of children suffering physical or sexual assault.

Although the following vulnerabilities increase the risk of child sexual and/or criminal exploitation, it must be remembered that not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:

- having a prior experience of neglect, physical and/or sexual abuse;
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- recent bereavement or loss;
- social isolation or social difficulties;
- absence of a safe environment to explore sexuality;
- economic vulnerability;
- homelessness or insecure accommodation status;
- connections with other children and young people who are being sexually and/or criminally exploited;
- family members or other connections involved in adult sex work and/or other criminal activity;
- having a physical or learning disability;
- being looked after (particularly those in residential care and those with interrupted care histories);
- issues/anxieties about sexual identity.

Our schools teach children about consent and the risks of sexual and criminal exploitation in the PSHE and SRE curriculum. A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim.

The child may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse.

The trust/school acknowledges that victims of both CCE and CSE are not always recognised and can be criminalised for actions they take whilst under coercion despite professionals continuing to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

The trust/school recognises the vulnerabilities of children who are criminally and sexually exploited and will always treat them as victims. It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.

All staff are trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Children's Social Care as with any other child protection concern and with particular reference to SP procedures. Parents will be consulted and notified as above.

Following a referral to Children's Social Care, a Multi-Agency Child Exploitation (MACE)

meeting may be convened under SP inter-agency safeguarding procedures. The school will attend and share information at MACE meetings as required. Parents and young people will be invited to attend MACE meetings by Children's Social Care as appropriate.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that a child may be involved in county lines are:

- child receives requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- child is exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- child is found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- child owes a 'debt bond' to their exploiters
- child has a bank account/s used to facilitate drug dealing.

For further information see:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf).

<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

Serious violence

All staff are made aware of indicators that and are trained to record and report any concern about children who may be at risk from or are involved in committing serious violence as with any other safeguarding concern. Indicators may include increased absence; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; and/or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and/or criminal exploitation.

The trust/school recognises that serious violence can often peak in the hours just before and after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for children involved in serious violence. All staff are trained to be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male; having been frequently absent; suspended; 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; and/or having been involved in offending, such as theft or robbery.

Honour or faith-based abuse

Honour or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff are trained and expected to be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

All forms of HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBA to the Designated Safeguarding Lead (or a deputy) as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children's Social Care as with any other child protection concern; and may also contact the Forced Marriage Unit on 020 7008 0151 or via email at fm@fcdo.gov.uk for advice as necessary.

Further information is available at [Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage \(accessible version\) - GOV.UK](#)

Female genital mutilation

Female genital mutilation (FGM) is a criminal offence. It is child abuse and a form of violence against women and girls and will be treated as such by this school. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting harmful consequences, including difficulties in childbirth.

The World Health Organisation estimates that four million girls around the world undergo some form of FGM every year. It is practised in at least 30 countries in Africa, Asia and the Middle East. FGM is also found in the UK amongst members of migrant and refugee communities. UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean. Non-African communities that practise FGM include Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

FGM typically takes place between birth and around 15 years old. However, it is believed that the majority of cases happen between the ages of 5 and 8.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both. It is also an offence for a UK national or UK resident (even in countries where FGM is not illegal) to perform FGM abroad; assist a girl to perform FGM on herself outside the UK; and assist (from outside the UK) a non-UK person to carry out FGM outside the UK on a UK national or UK resident.

(See <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines> for further information).

If staff have a concern that a girl may be at risk of FGM or they suspect may already have suffered FGM, they are trained and expected to inform the DSL (or a deputy) immediately and record the concern as they would any other child protection concern. The DSL will discuss the concern with Children's Social Care with a view to making a referral and will

inform the Police as appropriate.

Factors that may indicate a pupil may be at risk of FGM include:

- child's family have a low level of integration into UK society;
- child's mother and/or a sister have/has undergone FGM;
- FGM is known to be practised in the family's country of origin;
- child is withdrawn from PSHE;
- it is known that a female elder from the family's country of origin is visiting the family;
- child being taken on a long holiday to the country of origin;
- staff hear or overhear talk about a 'special' procedure to become a woman.

Indications that FGM may already have taken place may include a child:

- having difficulty or looking uncomfortable when walking, sitting or standing;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- having frequent urinary, menstrual or stomach problems;
- having prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- being reluctant to undergo normal medical examinations;
- confiding in a member of staff without being explicit about the problem due to embarrassment or fear;
- talking about pain or discomfort between her legs.

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. It will be rare for teachers to see visual evidence and they should not examine pupils (unlike in the medical profession where an observation may be made). Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/783684/FGM_The_Facts_A6_v4_web.pdf).

Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police by calling 101 or, where there is a risk to life or likelihood of serious immediate harm, by dialling 999 immediately. In any case, reports to the Police will be made as soon as possible after the teacher discovers a child has suffered FGM and by the close of the working day at the latest. A child protection referral will also be made to Children's Social Care as soon as possible after the report to the Police and also by the close of the working day at the latest.

The duty does not apply in relation to children who a teacher suspects may be at risk of FGM (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will inform the DSL (or a deputy) immediately and record their concerns in the normal way as above. Further information about FGM can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/783684/FGM_The_Facts_A6_v4_web.pdf

Forced Marriage

Forcing a person into a marriage is a crime under s.121 of the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats and coercion may include

physical, psychological, financial, sexual and emotional pressure; and also physical or sexual abuse. A lack of full and free consent can be where a person does not consent or where they cannot consent (e.g. if they have learning disabilities). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. Trust/School staff will be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

For further information see <https://www.gov.uk/forced-marriage> and

<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage/multi-agency-statutory-guidance-for-dealing-with-forced-marriage-and-multi-agency-practice-guidelines-handling-cases-of-forced-marriage-accessible>).

Marriage

While not honour-based abuse as such, the trust/school recognises and staff are trained to understand that, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Staff are expected to report any information or concern that comes to their attention that indicates a pupil/student is in any way being encouraged, persuaded, groomed, coerced or threatened - or is engaging in any plans - to take part in any form of marriage before their eighteenth birthday; to the DSL as with any other safeguarding concern.

Protecting Children from Radicalisation and Extremism

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have '*due regard to the need to prevent people from being drawn into terrorism*'. This duty is known as the **Prevent duty**.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

HMG (2024) defines extremism as the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

Some children may be susceptible to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the Designated Safeguarding Lead is responsible for the school's strategy for protecting children from those risks.

Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development they may be susceptible to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging, even if they are not otherwise vulnerable or identified by the school as such.

Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making some young people more susceptible to being influenced by extremist ideas. Young people who feel isolated or disaffected in some way are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

The school has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school.

During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised. The school is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. The school promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.

Trust/School staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern, identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning; and expressions of interest in extremist ideas along with a tolerance towards potential violence to certain members of society.

The Trust/School recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, the DSL (or deputy) will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

As a Channel partner, the trust/school may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support.

The Trust/School will discuss any concerns about possible radicalisation identified in school with a child's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation. Subject to consultation with the Police PREVENT team and in the interests of making proportionate responses, the school may offer support to children and their families through the provision of early support or family help as appropriate.

The Trust/School expects all staff, volunteers, governors, visiting practitioners, contractors and individuals or agencies that hire school premises to behave in accordance with the school's Staff Behaviour Policy (code of conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on trust/school premises or at events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website www.educateagainsthate.com informative and useful. The website is designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers, staff and trust/school leaders.

As part of each school's overall safeguarding arrangements and ongoing action plan for improvement, the DSL will consider identified local issues; intelligence from pupils, parents, staff and partner agencies; and new information from national issues and learning to review practice and procedures in order to keep pupils safe.

Referrals to the Prevent team will be made using the Prevent Referral Form, which can be downloaded from Warwickshire

<https://www.safeguardingwarwickshire.co.uk/images/downloads/Prevent-Referral-form-to-CHANNEL.pdf>. The completed referral form will then be sent to prevent@warwickshireandwestmercia.pnn.police.uk. Birmingham - <https://www.safeguardingsolihull.org.uk/wp-content/uploads/2024/06/National-Prevent-referral-form.pdf>

Any queries about any issue in relation to preventing radicalisation and extremism; or any difficulties in accessing or completing the form can be addressed by calling 01386 591816.

When the DSL considers it appropriate to submit a Prevent referral, they will also consult Children's Social Care about the need for a safeguarding referral.

Children who are looked after, were previously looked after or who have a social worker

The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable. The school ensures that staff have the necessary skills and understanding to keep children who are looked after and children who were previously looked after safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

The designated teacher for children who are looked after and previously looked after and the DSL hold details of the social workers for all children who are looked after or were previously

looked after; and the name and contact details of the Local Authority's virtual head for children who are looked after.

The school DSL will work closely with the designated teacher to monitor the progress of all children who are looked after or were previously looked after in order to ensure they receive the appropriate pastoral and academic support to promote their welfare and attainment.

Children with a social worker

The Trust/School recognises that when a child has a social worker, that may be due to the child experiencing abuse and/or exploitation and/or neglect and/or complex family circumstances; and that she/he may therefore be more vulnerable to harm than other children as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

The Trust/School will take those issues and needs into account when making plans to support children who have a social worker.

Care leavers

Local authorities have ongoing responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. The school DSL's will have details of the local authority Personal Advisor appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting a care leaver.

Kinship care including private fostering arrangements

Kinship care is any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term. A full definition of kinship care can be found on page 164-165 of [Working together to safeguard children - GOV.UK](#) (DfE 2026).

A private fostering arrangement is defined in *Working Together* as a form of kinship care that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (*under 18 if the child has a disability*) by someone other than a parent or close relative*, in their own home, with the intention that it should last for 28 days or more. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

*A close relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

On admission to school, they will take steps to verify who has parental responsibility for the child and the relationship of the adults accompanying the child who is being registered. Private fostering occurs in all cultures including British culture and a private fostering arrangement may start at any age.

Whilst most privately fostered children are appropriately supported, looked after and remain safe and well, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect; have been trafficked; are sexually or criminally exploited; or suffer modern-day slavery.

Parents and private foster carers both have a legal duty to inform Children's Social Care in

the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Schools have a mandatory duty to report to Children's Social Care in the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Trust/School staff are expected to notify the DSL when they become aware of or suspect private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school will also fulfil its duty to inform the local authority of the private fostering arrangement.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Many children see, hear or experience the effects of domestic abuse between family members at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). That can include physical, emotional and sexual abuse; and also stalking, criminal and financial exploitation. Victims may not recognise their partner's behaviour as abusive.

Exposure to domestic abuse and/or violence can have a detrimental and long-term impact on a child's health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been, married to each other or civil partners; have agreed to marry or become civil partners; have been in an intimate relationship with each other; have shared parental responsibility for the same child; or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear or experience the effects of the abuse; and they are related to the abusive person.

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background; and domestic abuse can take place inside or outside of the home.

Staff are trained and expected to report all concerns about children being affected by domestic abuse to the DSL (or a deputy) as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early support or family help.

Our schools in Warwickshire have committed to participating in Operation Encompass. The school works in partnership with Warwickshire Police and Warwickshire Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass.

The Police now have a statutory duty to notify the school when they attend any incident of domestic violence or abuse in any household in which a pupil of the school lives (whether or not the child is present at the time of the incident). The headteacher and Designated Safeguarding Lead will receive a confidential and secure email on the morning of the next school day, notifying them simply that there has been an incident and that the child may need support.

On receipt of any such notification, the headteacher and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due kindness, care and sensitivity. In addition to supporting children, the process means that the school will also be able to offer parents and carers support as appropriate.

The information will be managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The school DSL (and any deputies) refer any concerns to the *Local Housing Authority* so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

Alternative Provision –

KCSiE 2026 states that "Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the pupil's needs". The school will act in accordance with that guidance and the guidance [Arranging Alternative Provision - guide for LAs and schools](#).

The DSL will maintain an overview of all pupils accessing any part of their learning from an alternative provider or via delivery online or offsite provided by any organisation or individual not employed by the school. The DSL will ensure that robust arrangements are in place for timely and effective two-way sharing of safeguarding information - including records of all safeguarding concerns - between the school and alternative/external providers.

The DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and to enable the swift reporting of non-attendance and children going missing from alternative/ external providers at any time when they should be with that provider. The DSL will also ensure that effective quality assurance arrangements are in place in order to monitor the ongoing effectiveness of all safeguarding arrangements that alternative/external providers have in place.

Work experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervising pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education 2026. Each school will hold and store the details for their pupils.

Children staying with host families

The schools may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the schools follow the guidance in Keeping Children Safe in Education 2026, Annex D to ensure that hosting arrangements are as safe as possible.

Some overseas pupils may reside with host families during school terms and we will work with the Local Authority to check that such arrangements are safe and suitable. It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. The school will also make parents aware of these arrangements.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The school/college will access guidance highlighted in Keeping Children Safe in Education 2026, which explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. Please see [Get help with child arrangements - Get help with child arrangements \(justice.gov.uk\)](https://www.justice.gov.uk/get-help-with-child-arrangements).

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The schools will seek to support pupils/students in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate; with reference to the guidance 'Supporting all professionals to work with offenders' children and their families – please see <https://www.nicco.org.uk>.

Elective home education (EHE)

Keeping Children Safe in Education 2024 acknowledges that “Many home educated children have a positive learning experience. We would expect the parents’ decision to home educate to be made with their child’s best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs”.

In the event of parents/carers informing the school of their intention to remove their child from the school with a view to educating her/him at home, the school will work in partnership with the local authority, other key professionals and the parents/carers in order to consider what is in the best interests of the child, particularly when a child has SEN/D, and/or has a social worker, and/or is otherwise vulnerable. Where the child has an EHCP, the school will support the local authority and work closely with the parents/carers to review the plan.

Local contextual issues

Individual schools will have details of local contextual issues detailed in their child protection policy. All central staff should consult the policy for the school that they are working in for further details.

Related safeguarding policies

- Staff Behaviour Policy (code of conduct)
- School copies of Physical intervention and the use of reasonable force
- School copies of Behaviour policies
- School copies of Personal and intimate care
- Complaints procedure
- Tackling bullying including prejudice-based bullying
- Physical contact (school based)
- Whistleblowing
- School copies of SEND (school based)
- School copies of Attendance, absence and children missing education
- Safer recruitment and selection
- Managing allegations
- Grievance and disciplinary
- Gender-questioning children (school based)

Reference Documents

Keeping Children Safe in Education (DfE 2026)

Working Together to Safeguard Children (DfE 2026)

Warwickshire Safeguarding Partnership multi-agency safeguarding procedures
<https://westmidlands.procedures.org.uk/>

Safeguarding Children - Information and Record Keeping (WCC Education Safeguarding Service)

What to do if You’re Worried a Child is being Abused 2015 - Advice for Practitioners (HMG 2015)

Working together to improve school attendance (DfE 2026)

Sharing nudes and semi-nudes – Advice for education settings working with children and young people (UK Council for Child Internet Safety 2024)

Further Information, Advice and Support

Advice and support about all safeguarding issues and responsibilities are available via subscription to the A&A Safeguarding in Education Advice and Support Subscription Service – contact advice@asine.co.uk (subscribing schools) or enquiries@asine.co.uk for information about the service.