KEYS
Academy Trust

TKAT Child Protection and Safeguarding Policy

KEYS Academy Trust
Unlocking the future

Version control summary and overview details

TKAT Statutory Policy

- All schools require a policy on this area.
- There should be no changes to the core text.
- LGBs will minute that they have noted Trust approval and will adopt the policy effective immediately.
- This is a Trust policy to be implemented by all schools within The Keys Academy Trust to ensure a consistent approach for all.

Version control

Date	Change
September 2021	Adoption of this model policy written by The Key for School Leaders approved by Forbes Solicitors to replace WBC model version
September 2022	Additions following the updates to Keeping Children Safe in Education 2022. Responsibilities of Trustees of The Keys Academy Trust
September 2023	Additions following the updates to Keeping Children Safe in Education 2023
July 2024	Additions following the updates to Keeping Children Safe in Education 2024 and the Prevent duty guidance
July 2025	Additions following the updates to Keeping Children Safe in Education 2025 and the Prevent duty guidance
July 2026 (2026 V1)	Additions following the updates to Keeping Children Safe in Education 2026, Working Together to Safeguard Children and the Prevent duty guidance
September 2026 (2026 V2)	Updated statutory guidance references; enhanced awareness of prejudice-based harm and discrimination (including faith-based prejudice); more detailed volunteer vetting procedures; clearer definitions of regulated activity; expanded recognition of discriminatory behaviour as a form of child-on-child abuse.

Reviewed by (Trust Officer)	Hester Wooller, CEO
Approved by TKAT Trustee Committee:	CECE
Trust date of approval:	September 2026
Trust date of next review:	Autumn 2027

TKAT vision

We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

Key areas of note

Please note the following, which will be applicable throughout the policy:

- Any reference to 'headteacher' should read as whatever title is relevant to the school using the policy (i.e. Executive Headteacher/Head of School or Headteacher). Anything else will be explicitly referenced within the policy.
- Any reference to 'everyone' to staff, trustees, local governors and pupils.
- Any reference to 'we' should be read as The Keys Academy Trust.
- Any reference to 'parents' should be read as 'parents, carers and guardians'.

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This policy sets out the child protection and safeguarding procedures for The Keys Academy Trust (TKAT).

Name of Trust Safeguarding Lead: Mrs Hester Wooller

Trustees will:

- provide the strategic leadership for the Trust with responsibility for the Trust's safeguarding arrangements and must ensure that they comply with their duties under legislation;
- have regard to guidance, ensuring policies, procedures and training in their schools are effective and comply with the law at all times.
- have a senior board member lead to take leadership responsibility for the Trust's safeguarding arrangements;
- ensure policies and procedures adopted by the board (particularly those concerning referrals of cases of suspected abuse, exploitation and neglect), are understood, and followed by all staff;
- set out risks and how they will be managed in a risk register which is regularly reviewed;
- respond quickly to concerns and carry out appropriate investigations never ignoring harm or downplay failures;
- ensure enough resources, including trained staff/volunteers/trustees for safeguarding and protecting people are available;
- conduct periodic reviews of safeguarding policies, procedures and practice; and
- make sure protecting children and young people from harm is central to its culture and work.

Role	Name	Contact Details	Date Training
Trust Designated Safeguarding Lead	Mrs Hester Wooller	CEO@keysacademytrust.org 0118 324 7265	December 2025
Designated Trustee for Safeguarding	Mr David Cousins	D.Cousins@keysacademytrust.org 0118 324 7265	April 2025
LA Safeguarding Contact/LADO (Local Area Designated Officer)	LADO@wokingham. gov.uk LADO@bracknellforest.gov.uk	0118 974 6141 01344 351572	
WBC Children's Social Care BFC Children's Social Care	triage@wokingham.gov.uk mash@bracknellforest.gov.uk	0118 908 8002 (out of hours 01344 786543) 01344 352005 (out of hours 01344 351999)	
Berkshire West Safeguarding Children Partnership (BWSCP) Bracknell Forest Safeguarding Board	wscb@wokingham.gov.uk BFSB@bracknell-forest.gov.uk	www.berkshirewestsafeguardingchildrenpartnership. org.uk/scp https://bracknellforestsafeguarding.org.uk/	
ARC Information and Counselling Service	35 Reading Road Wokingham RG41 1EG	http://www.arcweb.org.uk	
Channel helpline		02073407264	
Threshold guidance: Wokingham Bracknell Reading	https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp/wokingham/wokingham-threshold-guidance https://bracknellforestsafeguarding.org.uk/p/professionals/guidance-for-professionals https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp/threshold-guidance/reading-threshold-guidance		

All parents/carers are made aware of the school's responsibilities in regard to safeguarding procedures through publication of the school's safeguarding policy on the school's website and a copy can be obtained from the school office.

1. Aims

1.1 The trust aims to ensure that:

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

2. Legislation and statutory guidance

2.1 This policy is based on the Department for Education's (DfE's) statutory Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2023), and the Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

2.2 This policy is also based on the following legislation:

a) Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
b) Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
c) Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
d) Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
e) The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
f) Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
g) Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
h) The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
i) The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes the duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
j) The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
k) Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse
l) The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare

Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children

m) This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

2.3 This policy also complies with our funding agreement and articles of association.

3. Definitions

3.1 Safeguarding and promoting the welfare of children means:

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

3.2 **Child protection** is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

3.3 **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

3.4 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

3.5 **Making or sharing of nudes and semi-nudes** is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

3.6 **Children** includes everyone under the age of 18.

3.7 The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

a) The local authority (LA)
b) Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
c) The chief officer of police for a police area in the LA area.

3.8 **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

3.9 **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

4.1 Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

4.2 We give special consideration to children who:

a) Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
b) Are young carers
c) May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
d) Have English as an additional language
e) Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
f) Are at risk of Female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
g) Are asylum seekers
h) Are at risk due to either their own or a family member's mental health needs
i) Are looked after or previously looked after (see section 12)
j) Are missing or absent from education for prolonged periods and/or frequently
k) Whose parent/carer has expressed an intention to remove them from school to be home educated.

5. Roles and responsibilities

5.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, trustees, governors and volunteers in the Trust and is consistent with the procedures of the 3 safeguarding partners.

5.2 Our policy and procedures also apply to extended school and off-site activities.

5.3 The trust plays a crucial role in preventative education. This is in the context of a whole-trust approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

a) Behaviour policy
b) Pastoral support system
c) Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

- What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.4 **Staff**

5.4.1 All staff will:

a) Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
b) Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
c) Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
d) Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
e) Through training and feedback be given the opportunity to contribute to and shape the policy and safeguarding arrangements

5.4.2 All staff will be aware of:

a) Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, online safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
b) the trust's unauthorised absence procedures and children missing education procedures
c) The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
d) The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
e) The process for community-based Family Help assessments
f) The importance of implementing the IT provider's policies relating to filtering systems which control access to websites and content and should any issues the staff the need to report immediately to the DSL
g) What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
h) The signs of different types of abuse, neglect and exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
i) The safeguarding issues that often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplainable and/or persistent absences from education
    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
    - Consensual and non-consensual making or sharing of nudes or semi-nudes
j) New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
k) The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
l) The fact that children can be at risk of harm inside and outside of their home, at school and online

m) The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
n) That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
o) The potential vulnerabilities of children who are questioning their gender
p) That children may experience prejudice-based harm including racism, faith-based prejudice and other forms of discrimination. These experiences may affect a child's welfare, wellbeing, mental health and ability to seek help
q) That a child and their family may be experiencing multiple needs at the same time
r) What to look for to identify children who need help or protection.

5.4.3 Sections 10 - 16 and Appendix 4 of this policy outlines in more detail how staff are supported to do this.

5.5 The designated safeguarding lead (DSL)

5.5.1 The DSL is a member of the senior leadership team. Our DSL is noted on our website. The DSL takes lead responsibility for child protection and wider safeguarding in the school. The DSL has the appropriate status and authority to carry out their job. This includes online safety, and understanding our filtering and monitoring processes on trust devices and trust networks to keep pupils safe online.
During term time, the DSL will be available during working hours for staff to discuss any safeguarding concerns.

5.5.2 Outside of working hours, the DSL team can be contacted via the email on our website.
When the DSL is absent, the deputy DSLs (as noted on the website) – will act as cover.

5.5.3 If the DSL and deputies are not available, a named individual will act as cover (for example, during out-of-hours/out-of-term activities).

5.5.4 The DSL will be given the time, funding, training, resources and support to:

a) Provide advice and support to other staff on child welfare, safeguarding and child protection matters
b) Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
c) Contribute to the assessment of children
d) Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police and support staff who make such referrals directly
e) Have a good understanding of harmful sexual behaviour
f) Have a good understanding of the filtering and monitoring systems and processes in place at our trust
g) Make sure that staff have appropriate Prevent training and induction

5.5.5 The DSL will also:

a) Keep the trustees informed of any issues
b) Liaise with local authority case managers and designated officers for child protection concerns as appropriate
c) Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
d) Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

e) Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
f) Ensure that child protection files are kept up to date
g) Where children leave the school, ensure their child protection file is transferred to the new school
h) liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
i) liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
j) promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
k) liaise with staff to follow up all unexplained pupil absences immediately. Where no contact is made with the parent/carer, staff will attempt to contact all emergency contacts listed. If the child's whereabouts remain unknown, or there are safeguarding concerns, the DSL, will decide whether to make a referral to Children's Social Care and/or contact the police to carry out a welfare check. All actions and decisions will be recorded on CPOMS. Where a child is subject to a Child Protection Plan or is a Looked-After Child, any unexplained absence will be reported to the allocated social worker without delay.
l) work with the trustees and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
    - ensuring that the trust knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
    - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
    - ensuring that the current policy is provided to and followed by, all staff, including being shared with, and explained to, new staff at induction. That all staff have access to and understand the policy, especially new and part-time staff.

5.5.6 The full responsibilities of the DSL and deputies are set out in their job description.

5.6 The local governing body lead for safeguarding

5.6.1 The role of Designated Safeguarding Governor is crucial to provide effective scrutiny to inform governance and ensure best practice is in place. Essential to fulfilling this role the Designated Safeguarding Governor:

a) Must fully understand the requirements of safeguarding legislation and advisory guidance and how this should be implemented across the organisation;
b) Must check that the school is compliant with statutory legislation and guidance;
c) Ensure every member of staff is provided with a copy of this Child Protection and Safeguarding Policy and any updates.
d) Ensure that a copy of, or link to, this policy is contained in all application packs for jobs at the school.
e) Must ensure there are effective systems in place to keep vulnerable children safe;

f) Must ensure preventative measures are in place to mitigate child-on-child abuse, particularly sexual harassment and abuse, and that robust procedures are in place to identify and effectively manage cases of child-on-child abuse. This includes appropriate measures for victims and perpetrators;
g) Must determine if there is a consistency in safeguarding across the whole organisation;
h) Must demonstrate confidence and support governance in their challenge to senior leaders on strategies for monitoring and improving the behaviour and safety of pupils.
i) Should support the work of the DSL and Deputy DSLs
j) Is required to report back to the Local Governing Body about the effectiveness of the organisation's safeguarding arrangements.

5.6.2 For safeguarding to be effective, the Named Safeguarding Governor and the DSL should work together to ensure that both the strategic safeguarding approach and day-to-day practice work well. You should meet together on a regular basis to discuss safeguarding and include other people where appropriate. Discussion topics may include:

a) New or emerging issues within the organisation / locality
b) Vulnerable groups such as SEND children, children with a social worker, Looked After Children and children with known mental health and / or behavioural difficulties
c) Referrals
d) Multi-agency support
e) Online / e-Safety issues
f) Thematic topics e.g. FGM, Prevent Duty, child-on-child abuse.

5.6.3 Although working in partnership with the DSL, the Named Safeguarding Governor remit is a strategic role. It is not your remit to carry out the role of the DSL, make or contribute to decisions about individual cases.

5.7 The local governing body

5.7.1 The local governing body will:

a) Review the school-specific elements of this policy after the trust level policy has been reviewed and approved ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
b) Ensure that all staff who work directly with children read at least part 1 of Keeping Safe in Education (KCSIE) and those who staff who do not work directly with children read part 1 of KCSIE
c) Adopt, implement and monitor this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
d) Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
e) Appoint a link governor to monitor the effectiveness of this policy in conjunction with the local governing board. This is always a different person from the DSL
f) Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
g) Ensure the school implements the TKAT appendix for the behaviour policy in respect of the use of restrictive interventions, including the use of reasonable force, using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances. This reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
h) Ensure the school has appropriate cyber security systems in place
i) Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

- Ensuring that reviews should are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

5.7.2 Tasks will include:

a) Assessment of Current Setup
b) Implementing Content Filtering and Firewalls
c) Mobile Device Management
d) Data Privacy Compliance
e) Internet Safety Training
f) Regular Security Audits and Updates

5.7.3 An online safety framework that protects users and sensitive data while also promoting responsible and secure technology for a secure and stable learning environment will be established by IT and service providers.

5.7.4 The Local Governing Body will make sure:

a) The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
b) Online safety is a running and interrelated theme within the whole-trust approach to safeguarding and related policies
c) The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
d) The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
e) That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse, exploitation or neglect being recognised

5.7.5 Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

a) Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
b) Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
c) Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

5.7.6 The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (Any such allegations will be reported immediately to the CEO of the Trust - see appendix 3).

5.7.7 All trustees and governors will read Keeping Children Safe in Education in its entirety.

5.7.8 Section 19.8 of this policy has information on how governors are supported to fulfil their role.

5.8 The headteacher

5.8.1 The headteacher is responsible for the implementation of this policy, including:

a) Ensuring that staff (including temporary staff) and volunteers:
- Are informed of our systems which support safeguarding, including this policy, as part of their induction

a) Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect
b) Communicating this policy to parents when their child joins the school and via the school website
c) Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
d) Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly. This is to include training in the role staff play in enforcing the IT policies related to filtering and monitoring so that staff members understand their responsibilities and the rationale for these measures.
e) Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
f) Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
g) Ensuring the relevant staffing ratios are met, where applicable
h) Making sure each child in the Early Years Foundation Stage is assigned a key person
i) Making sure that in accordance with the statutory framework for the Early Years Foundation Stage (EYFS), at least one member of staff with a current full Paediatric First Aid (PFA) certificate is on the premises at all times when children are present, and accompanies children on all outings.
j) Making sure that newly qualified EYFS staff (Level 2 or 3) who work directly with children are supported to meet the requirement to hold a full PFA or emergency PFA certificate in line with EYFS guidance.
k) Overseeing the safe use of technology, mobile phones and cameras in the setting

5.9 Virtual school heads

5.9.1 Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker and to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

5.9.2 They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality

6.1 In order to ensure a culture of safeguarding:

a) Timely information sharing is essential to effective safeguarding
b) Arrangements should be in place setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
c) Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
d) The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
e) If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

f) Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
g) If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
   - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
   - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

6.2 The DSL should consider that:
a) Parents should normally be informed (unless this would put the victim at greater risk)
b) The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
c) Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
d) Children under 13 can never provide valid consent to sexual activity.

6.3 Regarding anonymity, all staff will:
a) Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
b) Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
c) Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

6.4 The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

6.5 If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

6.6 Where a child leaves the school the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving

6.7 Confidentiality is also addressed in this policy with respect to record-keeping in section 18, and allegations of abuse against staff in appendix 3.

6.8 Sharing safeguarding information must be underpinned by these key principles:
a) The safety and welfare of the child is paramount.
b) Information sharing is necessary to protect children from harm.
c) Only share information on a need-to-know basis and in a proportionate manner.
d) Be transparent: inform children and parents/carers (where appropriate) about what information is shared and why.
e) Comply with UK GDPR and Data Protection Act 2018, but do not let these prevent necessary safeguarding sharing.
f) Keep accurate, secure records of all information shared.

6.9 Within the School, we share information to ensure all relevant staff are aware of safeguarding concerns and can act to protect children in the following way:

a) Share safeguarding information with the Designated Safeguarding Lead (DSL) or their deputy immediately.
b) DSL decides who else within the school needs to know (e.g., SENCO, class teacher, pastoral staff) based on necessity for the child's safety.
c) Information is shared via CPOMS.
d) Limit access strictly to those who need to know.
e) Record on CPOMS decisions made and who was informed.

6.10 With the 3 Safeguarding Partners, we share information to facilitate multi-agency safeguarding and promote the welfare of children in the following way:

a) DSL or headteacher contacts the relevant safeguarding partner (local authority, health, police) as soon as a significant concern is identified.
b) Use local procedures and referral forms (e.g., MARF).
c) Share factual, relevant, and proportionate information.
d) Keep a record on CPOMS of what was shared, with whom, and why.
e) Attend and contribute to multi-agency meetings.

6.11 With other agencies/organisations to ensure effective safeguarding we share information in the following way:

a) Assess the necessity and proportionality of sharing.
b) Seek consent from the child/parent unless it puts the child at further risk.
c) Share only what is relevant for safeguarding.
d) Use secure methods to share information (e.g. secure portals).
e) Keep a record on CPOMs of what information was shared and the rationale.

7. Recognising abuse and taking action

7.1 All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

a) Has a disability or has certain health conditions and has specific additional needs
b) Has special educational needs (whether or not they have a statutory education health and care (EHC plan)
c) Has a mental health need
d) Is a young carer
e) Is bereaved
f) Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
g) Is frequently missing/goes missing from education, care or home
h) Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
i) Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
j) Is at risk of being radicalised into terrorism
k) Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
l) Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
m) Is misusing drugs or alcohol
n) Is suffering from mental ill health

o) Has returned home to their family from care
p) Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
q) Is a privately fostered child
r) Has a parent or carer in custody or is affected by parental offending
s) Is missing education, or persistently absent from school, or not in receipt of full-time education

7.2 Staff should recognise that some pupils may be disproportionately vulnerable to an increased risk of abuse, both online and offline. For example, some may be at more risk of harm from specific issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

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

7.4 Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.8 for what to do.)

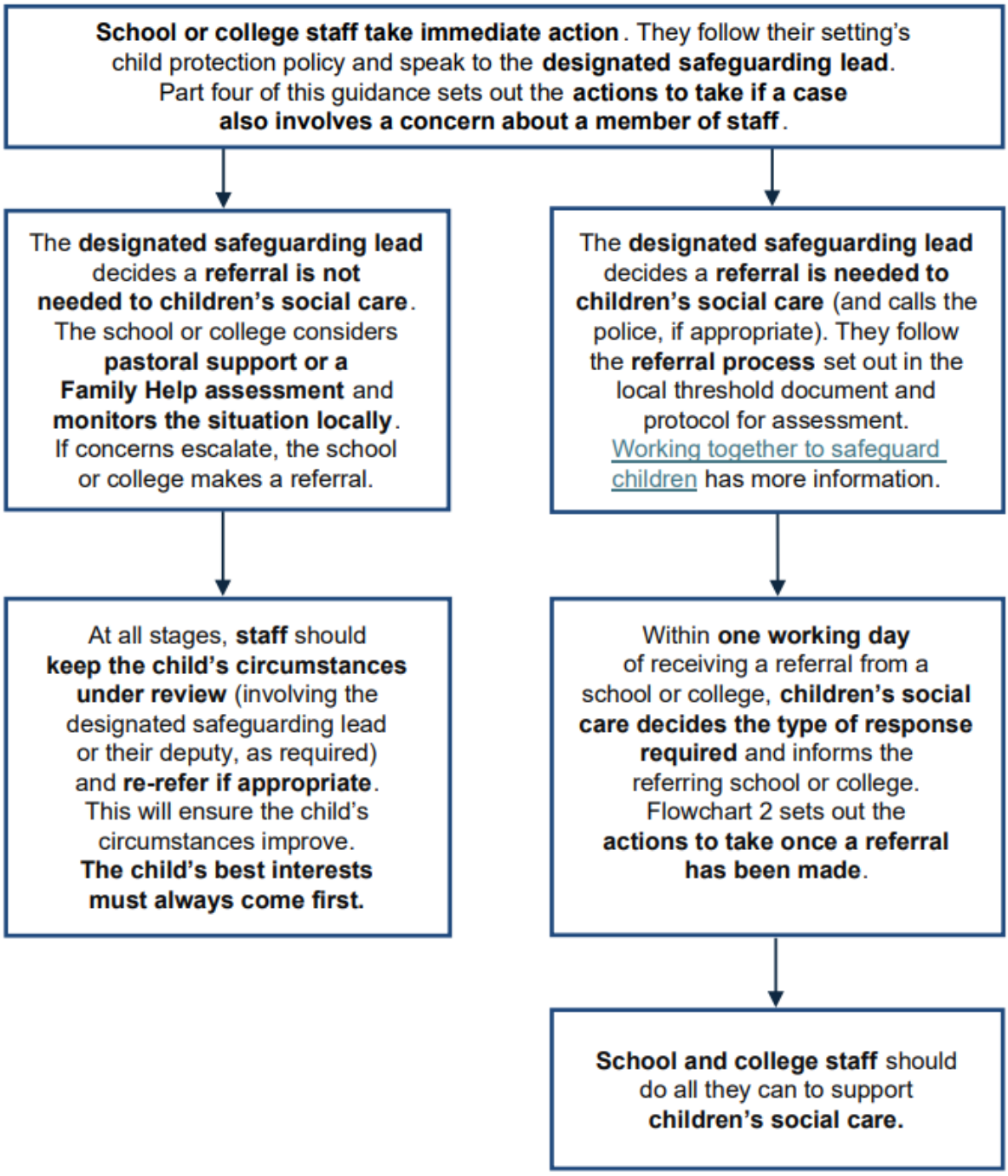
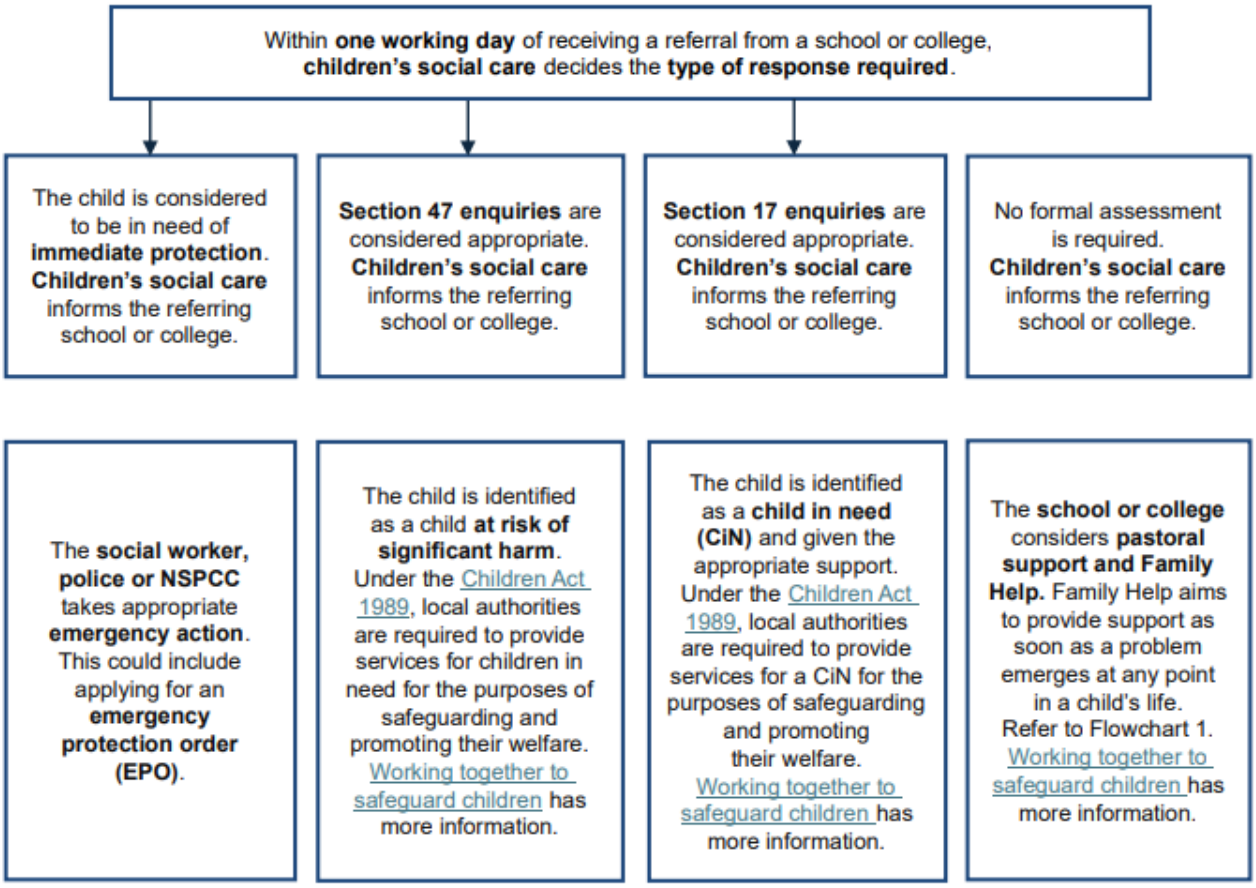


Figure 2: actions taken once a referral has been made to children's social care



7.5 If a child is suffering or likely to suffer harm, or in immediate danger

7.5.1 Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

7.5.2 Tell the DSL, as soon as possible, if you make a referral directly.

7.5.3 If you have any worries about a child or young person who you feel is being ill-treated, abused, exploited or neglected you should contact Children's Services immediately. Children and their parents may need help urgently.

7.5.4 All immediate concerns should be discussed with a social worker by calling the appropriate Children's Safeguarding and Social Care Team (see important contacts on pages 4). You will also need to complete a multi-agency referral form (MARF) (see below).

7.5.5 You can also discuss your concerns with:

- Thames Valley Police: Telephone **101**
- NSPCC (National Society for the Prevention of Cruelty to Children) 24 hour helpline: **0808 800 5000**

7.5.6 Multi agency Referral Form (MARF) – if this form includes personal/sensitive information, please ensure that you take appropriate measures to protect the data in line with your school Data Protection procedures. This might include encrypting the data whilst in transit by adding [secure] to the subject line if your school uses secure email system or using an equivalent system. If you are unsure, please contact your school Data Protection Officer.

7.5.7 To access the Wokingham Children Services MARF document, please click on this link new_marf.docx (live.com)

7.5.8 To access the Bracknell Children's Services MARF referral form:https://csccportal.bracknell-forest.gov.uk/s4s/FormDetails/FillForm?formId=396

7.5.9 Call 999 in an emergency or if you believe a child is in immediate danger

7.5.10 Buckinghamshire Safeguarding Children Board and the Buckinghamshire Safeguarding Adults Board as a joint venture, commissioned the production of a safeguarding film to raise awareness of safeguarding issues for children and adults and how to report a concern. They have kindly given their permission for it to be shared. https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp/wokingham/concerned-about-a-child-in-wokingham

7.5.11 Link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

7.6 If a child makes a disclosure to you

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

a) Listen to and believe them. Allow them time to talk freely and do not ask leading questions
b) Stay calm and do not show that you are shocked or upset
c) Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
d) Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
e) Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
f) Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.8), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

a) Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
b) Not recognise their experiences as harmful
c) Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.7 EYFS

7.7.1 We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

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

7.8.1 Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

7.8.2 FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

7.8.3 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

7.8.4 **Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

7.8.5 Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

7.8.7 The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

7.8.8 **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

- https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp/wokingham/concerned-about-a-child-in-wokingham
- https://bracknellforestsafeguarding.org.uk/

7.8.9 Regulated health and social care professionals and teachers in England and Wales have a duty to report to the police 'known' cases of Female Genital Mutilation in under 18s which they identify in the course of their professional work. Reports should be made using the non-emergency 101 telephone number.

7.9 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

7.9.1 Figure 1 above, illustrates the procedure to follow if you have any concerns about a child's welfare.

7.9.2 Where possible, speak to the DSL first to agree a course of action.

7.9.3 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

7.9.4 Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

7.10 Early help assessment

7.10.1 If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

7.10.2 We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

7.11 Referral

7.11.1 If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

7.11.2 If you make a referral directly (see section 7.8), you must tell the DSL as soon as possible.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

7.11.3 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.12 If you have concerns about extremism

7.12.1 If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

7.12.2 If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

7.12.3 Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

7.12.4 The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

7.13 If you have concerns about mental health

7.13.1 Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

7.13.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health , self harming, an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well place to recognise, including:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

7.13.3 If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.8. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person. If the child needs help urgently for their mental health but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

7.13.4 If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

7.13.5 Refer to the Department for Education guidance on mental health and behaviour in schools for more information.

7.14 Concerns about a staff member, supply teacher, volunteer or contractor

7.14.1 If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

7.14.2 The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

7.14.3 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

7.14.4 If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.14.5 As the Early years provision is within our school and not registered and inspected separately, there is no requirement to report to Ofsted but to act in line with the school's safeguarding policy reporting requirements (see appendix 3 for more detail).

7.15 Allegations of abuse made against other pupils

7.15.1 We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils. We also acknowledge that children may experience abuse in the form of prejudice-based harm including racism, faith-based prejudice and other forms of discrimination.

7.15.2 For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

7.15.3 All child-on-child abuse is unacceptable and will be taken seriously. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

7.15.4 Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this safeguarding and child protection policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

7.16 TKAT schools follow the local multi-agency arrangements for responding to incidents of sexual violence and sexual harassment. Designated Safeguarding Leads will work closely with Children's Social Care, Thames Valley Police and other safeguarding partners to determine appropriate safeguarding actions, referrals, risk assessments and support arrangements for victims, alleged perpetrators and any other children affected. Schools will seek advice from local agencies whenever there is uncertainty regarding thresholds, referral pathways or protective measures.

See appendix 4 for more information about child-on-child abuse.

7.17 Procedures for dealing with allegations of child-on-child abuse

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

a) You must record the allegation and tell the DSL, but do not investigate it
b) The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
c) The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected)

with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

d) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

7.17.2 Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children and school staff are supported and protected as appropriate.

7.18 Supporting a victim of child-on-child abuse

7.18.1 Child-on-child violence, abuse or harassment causes distress to the victim and in some cases the trauma may result in them struggling within the setting *e.g.* the normal classroom environment, maintaining a full-time timetable. Although action that would isolate the victim should be avoided, if a victim expresses a wish to withdraw from a lesson or activity this should be supported by providing a safe space to do so. Decisions to withdraw a victim should be made in their best interests and not actioned just to make managing situations easier for the setting.

7.18.2 As part of the immediate response to a report the DSL will carefully consider whether the victim and alleged perpetrator(s) should share classes and other spaces such as dining halls, libraries, ICT suites. Such decisions will be made on a case by case basis and consider the setting's safeguarding duties together with their duty to educate those involved.

7.18.3 Where cases involve a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim and measures should be taken to ensure a reasonable distance is maintained by all whilst they are on other areas of the premises. Such action does not indicate a judgement of guilt but is taken to ensure the best interests of all involved. The police will also advise on this action.

7.18.4 Where cases of sexual assault lead to a conviction or caution the setting should consider employing any suitable sanctions in line with the Behaviour policy. This may include continuing to keep the victim and perpetrator(s) in separate classes or in the permanent exclusion of the perpetrator(s).

7.18.5 It is important to consider arrangements for situations where cases of child-on-child sexual abuse are not reported to the police or where not guilty verdicts have been reached. In such cases the victims and perpetrator(s) will have been affected, therefore sharing of classes and potential contact should be carefully considered on a case by case basis.

7.18.6 Where ongoing support for the victim is required, appointment of a designated trusted adult should be discussed with them. This should be an adult who the victim feels able to approach and talk about their needs. Wherever reasonably possible the choice of designated trusted adult should be made by the victim.

7.18.7 As directed in KCSIE, schools must do everything they reasonably can to protect the victim of child-on-child abuse from additional peer on peer abuse such as bullying or harassment as a result of having made a report / disclosure.

7.18.8 Ideally victims should be given support to remain in their setting however if the trauma results in them being unable to do so, alternative provision should be considered to enable continuation of their education. In such cases the DSL will ensure the alternative education provider is made aware of any ongoing support needs for the victim. This will also include the transfer of the child protection file, even if the alternative provision is arranged on a temporary or fixed term basis.

7.19 Supporting a perpetrator of child-on-child abuse

7.19.1 The advice from KCSIE and the DFE on sexual violence and sexual harassment between children at schools, help schools to balance the need to safeguard the victim whilst providing the alleged perpetrator(s) with an education. It is important to recognise that taking action and providing appropriate support are not exclusive actions. The following principles will be followed for safeguarding decisions and supporting alleged perpetrators which include:

a) Consideration of the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and/or materials;
b) Consideration of the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them;
c) Ensuring that the perpetrator(s) is/are also given the correct support to try to stop them reoffending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future;
d) Remembering that schools can be a significant protective factor for children who have displayed HSB, and continued access to the setting, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions on sanctions such as exclusions are made;
e) Accessing advice from children's social care, the police, specialist sexual violence services and other third party sector agencies. (Details of advisory/support services is included in the table on page 4;
f) Considering appropriate additional measures for alleged perpetrators subject to bail conditions or who are released under investigation, where no conditions are attached to their release from custody. This involves striking a balance between management of risk and the rights of an unconvicted person. Police investigators will assist in the development of a balanced set of arrangements.

7.20 Supporting any other child affected by child-on-child abuse

7.20.1 Consideration should be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required such as nurture/pastoral support, access to a trusted adult to check in with during the day.

7.20.2 Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The school should be doing all they can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

7.20.3 Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves. The school should seek out specialist online safety support.

7.20.4 School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. The school, as part of its risk assessment, should consider any additional potential support needs to keep all of their children safe.

7.20.5 A whole school approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated.

7.20.6 Ensuring there is a strong behaviour, RSHE and online curriculum in place to create a culture in which all children at the schools are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

7.20.7 It is important that schools keep their policies, processes, and curriculum under constant review to protect all their children.

7.20.8 Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified in schools may also be reflective of the wider issues within a local area and emerging trends with safeguarding partners should be shared.

7.21 Creating a supportive environment in school and minimising the risk of child-on-child abuse

7.21.1 We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

7.21.2 To achieve this, we will:

a) Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
b) Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
c) Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
d) Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.20 below)
e) Ensure staff reassure victims that they are being taken seriously
f) Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
g) Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment
h) Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes

i) Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
j) Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
k) Ensure staff are trained to understand:
- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL.

7.21.3 The DSL will take the lead role in any disciplining of the alleged perpetrator(s), where needed. We will provide support at the same time as taking any disciplinary action.

7.21.4 Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

a) Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
b) There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.22 Making or sharing of nudes and semi-nudes ('sexting')

7.22.1 Your responsibilities when responding to an incident

7.22.1.1 All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately. Please refer to guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology.

7.22.1.2 You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

7.22.1.3 You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

7.22.2 Initial review meeting

7.22.2.1 Following a report of an incident, the DSL will inform the CEO of the Trust immediately. The DSL will then hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

7.22.2.2 The DSL will inform the CEO and make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making and sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

7.22.2.3 If none of the above apply then the DSL, in consultation with the CEO, headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

7.22.3 **Further review by the DSL**

7.22.3.1 If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. The outcome will be reported to the CEO of the Trust.

7.22.3.2 The DSL will hold interviews with the pupils involved (if appropriate)

7.22.3.3 If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

7.22.4 ***Informing parents/carers***

7.22.4.1 The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

7.22.5 ***Referring to the police***

7.22.5.1 If it is necessary to refer an incident to the police, this will be done through local neighbourhood police, dialling 101.

7.22.6 ***Recording incidents***

7.22.6.1 All incidents of making and sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

7.22.7 ***Curriculum coverage***

7.22.7.1 Pupils are taught about age appropriate issues within our E-safety curriculum, and keeping safe in PSHE including the NSPCC'S PANTs rule.

7.22.7.2 Pupils are taught about the issues surrounding the making and sharing of nudes and semi-nudes as part of our PSHE curriculum and our E-safety curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

a) What it is
b) How it is most likely to be encountered
c) The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
d) Issues of legality
e) The risk of damage to people's feelings and reputation

7.22.7.3 Pupils also learn the strategies and skills needed to manage:

a) Specific requests or pressure to provide (or forward) such images
b) The receipt of such images

7.22.7.4 This policy on the making and sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.22.7.5 Teaching follows best practice in delivering safe and effective education, including:

a) Putting safeguarding first

b) Approaching from the perspective of the child
c) Promoting dialogue and understanding
d) Empowering and enabling children and young people
e) Never frightening or scare-mongering
f) Challenging victim-blaming attitudes.

7.22.8 ***Reporting systems for our pupils***

7.22.8.1 Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

7.22.8.2 We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

7.22.8.3 To achieve this, we have:

a) Put systems in place for pupils to confidently report abuse
b) Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
c) Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

8. Online safety and the use of mobile technology

8.1 All schools will adopt and follow the TKAT Online Safety policy. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

8.2 To address this, our trust aims to:

a) Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers, governors and trustees
b) Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
c) Set clear guidelines for the use of mobile phones for the whole school community including the TKAT policy that all TKAT schools are a mobile phone-free environment by default.
d) Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

8.3 The 4 key categories of risk

8.3.1 Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, 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, such as 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, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

8.4 To meet our aims and address the risks above we will:

8.4.1 Educate pupils about online safety as part of our curriculum. For example:

a) The safe use of social media, the internet and technology
b) Keeping personal information private
c) How to recognise unacceptable behaviour online
d) How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

8.4.2 Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and their expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

8.4.3 Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

8.4.4 Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

8.4.5 Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

8.4.6 Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones as set out in the Searching, Screening and Confiscation appendix to the TKAT Behaviour Policy. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones as set out in the DfE's guidance on searching screening and confiscation.

8.4.7 Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. [Note: filtering and monitoring requirements also apply to your use of generative AI – see section 8.6 below] and TKAT Online Policy.

8.4.8 Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

8.4.9 Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

8.4.10 Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

8.4.11 This section summarises our approach to online safety and mobile phone use. For comprehensive details about our policy on online safety and the use of mobile phones, please refer to the TKAT Online Safety policy and Mobile Phone policy.

8.5 Images of Children and Young People

8.5.1 Photographs taken for curricular and assessment reasons may not be used for any other purpose. This includes EYFS pupils who have their photographs taken to provide evidence of their achievements for developmental records and as part of their end of Foundation Stage Profile.

8.5.2 Only school issued devices will be used to record and store pupils' photographs. Personal staff mobile phones or devices will not be used to record access or store pupils' personal images.

8.5.3 Devices will be appropriately encrypted if taken off site, to reduce the risk of a data security breach, in the event of loss or theft.

8.5.4 TKAT has a clear and sufficiently detailed Mobile Phone policy which covers the taking and use of digital images and video of pupils and takes steps to ensure that it is understood and enforced. Particular care will be taken when images of pupils may pass beyond the direct control of the school and into the public domain, e.g. on the school website, social networking. Guidance will include reference to the storage and deletion of images of pupils, including the policy on the use of devices with a facility to store or transfer data to other locations (e.g. 'cloud' storage) to ensure the school is line with ICO (Information Commission's Office) guidance.

8.5.5 **Acceptable Use Agreements** – Staff and pupils sign ICT Acceptable Use Agreements. For staff this includes a section on the use of digital images and clarification about the position regarding the use of personal mobile phones/cameras for taking pictures. Where volunteers are supporting school staff, they should abide by the same rules as school staff as far as is reasonable.

8.5.6 **Parental Permission** – The school will ensure that appropriate written permissions are obtained before any photographs or videos are used. Where parental permission has not been obtained, or it is known that a pupil should not be photographed or filmed, every reasonable effort should be made to ensure that a pupil's image is not recorded.

8.5.7 **Parents taking photographs or video** – Where the school chooses to allow the recording of images at events it will be made clear that images may only be recorded for personal use and can only be shared with immediate family and friends. Images must not be shared on social networking sites or other websites that are accessible by the general public.

8.5.8 **Events/Activities involving multiple schools** – When taking part in events organised by other schools or organisations, the schools involved will consider what image guidelines should apply. For larger events it is reasonable to expect that specific image guidelines should be in place. Consideration should be given as to how those attending the event will be informed of the image guidelines that apply. Although the school will make reasonable efforts to safeguard the digital images of pupils, parents should be made aware that at some types of event it is not always realistic to strictly enforce image guidelines. The school cannot therefore be held accountable for the use of images taken by parents or members of the public at events.

8.6 Artificial intelligence (AI)

8.6.1 Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as CoPilot, ChatGPT and Google Gemini.

8.6.2 The Trust recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

8.6.3 The Trust will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policy.

8.6.4 Staff should be given training so they are aware of the risks of using AI tools while these are still being developed. School and subject leaders should carry out risk assessments for any new AI tools planned to be used by pupils in the curriculum or by staff. Our trust's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

9. Notifying parents or carers

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

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

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

9.4 In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other children involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

9.5 The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

a) Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
b) Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

10. Pupils with special educational needs, disabilities or health issues

10.1 We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

a) Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
b) Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
c) The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
d) Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse

e) The need for intimate care or that these children are isolated from others
f) That these children are more likely to be dependent on adults for care
g) Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

10.2 We offer extra pastoral support for these pupils which is bespoke to the pupil (i.e. nurture assistant work, a designated adult to support, or liaising with wider agencies).

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENDCO. The school considers extra pastoral support and attention for these children and ensure any appropriate support for communication is in place.

11. Pupils with medical conditions

11.1 An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

11.2 A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

12. Young Carers

12.1 The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

13. Pupils with a social worker

13.1 Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

13.2 The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

13.3 Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

a) Responding to unauthorised absence or missing education where there are known safeguarding risks
b) The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

14.1 We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

a) Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
b) The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, (the inclusion lead, as noted on the website) who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

14.2 As part of their role, the designated teacher will:

a) Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
b) Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

15. Pupils who are lesbian, gay or bisexual

15.1 The school recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying.

15.2 Any concerns should be reported to the DSL.

16. Pupils who are questioning their gender

16.1 **Supporting pupils who are questioning their gender** - we are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

16.2 We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

16.3 When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.
The DSL will lead in these cases.

16.4 **Involving parents/carers in cases of pupils questioning their gender** - Where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority.

16.5 However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

16.6 Where a child confides in a member of staff about their feelings but does not ask the school to make changes to how they are treated, the school will only break any confidence if there is a related safeguarding risk.

16.7 **Considering requests for support with social transition** - the school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

16.8 Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE).

16.9 In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

a) The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
b) Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
c) Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
d) The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition.

16.10 The school will ensure that the decision-making process is documented and records are kept.

16.11 The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

16.12 **Rules on single-sex spaces** - Pupils are not allowed into toilets, changing rooms, showers or designated for the opposite biological sex, with no exceptions.

16.13 **Rules on single-sex sports** - The school may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances.

16.14 Some sports may need to be played in single-sex groups from a certain age to ensure children's safety and activities remain fair. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

17. Complaints and concerns about school safeguarding policies

17.1 Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

17.2 Any other complaints should be made in writing to the headteacher and will be dealt with in line with the Complaints Policy.

17.3 Written complaints relating to how a school is fulfilling the EYFS requirement must be investigated and the complainant notified of the outcome of the investigation within 28 days of having received the complaint. The school must make available to parents and/or carers the details about how to contact Ofsted, if they believe the provider is not meeting the EYFS requirements.

17.4 Whistleblowing

17.4.1 Please refer to the TKAT Whistleblowing Policy. The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance on how to raise concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

18. Record-keeping

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

18.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing electronically on the CPOMS system. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

18.3 The DSL is responsible for ensuring that child protection files are kept up to date. Records will include:

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

In line with GDPR regulations and BWSP expectations:

- Child protection reports or disclosures should be stored in a separate area of the pupil record or in a separate linked file.
- Concerns and referrals will be kept in a separate child protection file for each child.
- Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly, securely, and separately from the main pupil file.

18.4 To allow the new school to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

18.5 In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

18.6 The school shares information with other agencies and when this is appropriate, in line with our local safeguarding procedures.

18.7 In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

19. Training

19.1 All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

19.2 This training will be regularly updated and will:

a) Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
b) Be in line with advice from the 3 safeguarding partners to ensure that local criteria for action and the local protocol for assessment are understood
c) Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
d) Have regard to the Teachers' Standards to support the expectation that all teachers:
   - Manage behaviour effectively to ensure a good and safe environment
   - Have a clear understanding of the needs of all pupils

19.3 All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

19.4 Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

19.5 Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

19.6 Volunteers will receive appropriate training, if applicable.

19.7 The DSL and deputies

19.7.1 The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

19.7.2 In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

19.7.3 They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

19.8 Trustees and Local Governors

19.8.1 All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

a) Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
b) Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

19.8.2 As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

19.9 Recruitment – interview panels

19.9.1 At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

19.9.2 See appendix 2 of this policy for more information about our safer recruitment procedures.

19.10 Staff who have contact with pupils and families

19.10.1 Senior staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

19.10.2 In Early Years, the teacher will hold an approved qualification at level 3 or above and at least half of all other staff must hold at least an approved level 2 qualification. We will make sure that children are adequately supervised, especially whilst eating, and decide how to use staff to ensure children's needs are met. We will inform parents and/or carers about how staff are organised, and, when relevant and practical, aim to involve them in these decisions. Children will usually be within both sight and hearing of staff and always within sight or hearing.

20. Monitoring arrangements

20.1 This policy will be reviewed **annually** by The Keys Academy Trust. It will be adopted, implemented and monitored by the local governing body.

21. Links with other policies

21.1 This policy links to the following TKAT policies and procedures:

- Behaviour
- Dignity at Work (Bullying and harassment)
- Suspensions and Exclusions

- Code of Conduct
- Attendance
- IT Acceptable Use
- Online Safety
- Mobile Phone Use
- RSE
- Equality, Diversity and Inclusion
- Whistleblowing
- Volunteers
- Recruitment
- Complaints
- First Aid
- Health and Safety
- Data Protection
- School's Privacy Notices
- AI

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (KCSIE) 2026.

Appendix 1: types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 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.
Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve: a) Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person b) Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate c) 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 d) Seeing or hearing the ill-treatment of another e) Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children f) Verbal abuse such as criticism, belittling, or name-calling.
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: a) Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing b) 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 (including via the internet). 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.
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 care-givers) d) Ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education 2026.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our trust's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- If they are known to the police and children's local authority social care and
- If they have been disqualified from providing childcare
- Sign a declaration confirming the information they have provided is true.

We will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references (for example, "To whom it may concern")
- Not rely on applicants to obtain their reference
- For EYFS, not accept references from a family member
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children. If the applicant has never worked with children, then ensure a reference is from their current employer, training provider or education setting
- Ensure electronic references originate from a legitimate source
- Contact referees to clarify where information is vague or insufficient information is provided
- Establish the reason for the applicant leaving their current or most recent post, and ensure any concerns are resolved satisfactorily before appointment is confirmed
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Include SOAR Interview questions to probe a candidate's experiences, own values and motivations (Situation/Objective/Action and Result)
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check
    - For newly appointed staff or volunteers if they will start work in regulated activity before the DBS certificate is available
    - Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to their appointment to the school

- For EYFS, staff and volunteers **MUST NOT** be permitted to begin work in regulated activity in EYFS settings until the enhanced DBS certificate with barred list information has been received.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

*Management positions are most likely to include, but are not limited to, headteachers, heads of school and deputy/assistant headteachers.

Where required by the relevant legislation: We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's or the volunteer's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

Agency and third-party staff
We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors
We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.
We will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will **not be** allowed to work unsupervised or engage in regulated activity under any circumstances.
We will check the identity of all contractors and their staff on arrival at the school.
Where required by the relevant legislation: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers
Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.
Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.
Where required by the relevant legislation: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers
We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Where required by the relevant legislation: Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Members, Trustees, Local Governors
All members, trustees and local governors will have an enhanced DBS check without barred list information.
They will have an enhanced DBS check with barred list information if working in regulated activity.
All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.
All Members, trustees, local governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings
Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience
When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.
We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families
Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.
Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: allegations of abuse made against staff (including low-level concerns)

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education (KCSIE 2026). Any such allegations will be reported immediately to the CEO of the Trust who will advise and support the process to be followed.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- 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 – this includes behaviour taking place both inside and outside of school.

If we're in any doubt as to whether a concern meets the harm threshold, we will first consult the CEO of the Trust and then consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
A 'case manager' appointed by the CEO, will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation or the Chair of the Trust if the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, the CEO of the Trust, will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

a) Redeployment within the school so that the individual does not have direct contact with the child or children concerned
b) Providing an assistant to be present when the individual has contact with children
c) Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
d) Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
e) Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for The Keys Academy Trust.
f) If in doubt, the CEO will seek views from the trust's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the person subject to the allegation of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed,** take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The individual will be told to seek advice from trade union representatives or a colleague and signposted to counselling/medical support available from SAS or Education Support https://www.educationsupport.org.uk/.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- For early years provision: we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the trust is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

The local governing body will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate. Teacher training providers are expected to follow the same procedures as supply agencies.

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Timescales - Specific actions

Action following a criminal investigation or prosecution
The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated
If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension
If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports
If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations
If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The trust and school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises. All communication with the press must be approved by the CEO.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records regarding the allegation at least until the accused person has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks
- We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.
- All staff have a duty of care as outlined in the staff code of conduct:
- Staff must:
- Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- Always act, and be seen to act, in our students' best interests
- Avoid any conduct which would lead any reasonable person to question their motivation and/or intentions
- Avoid any conduct that could amount to discrimination or harassment
- Ensure their actions are warranted, proportionate, safe and applied equitably and
- Take responsibility for their own actions and behaviour.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.
We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.13 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Developing and implementing a low-level concerns policy: A guide for organisations which work with children

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

a) Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
b) Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
c) Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education (KCSIE 2026), in particular part 1.

Part 1 also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime. The headteacher will follow the locally agreed procedures put in place by BWSCP and Bracknell Forest Safeguarding Board:

Berkshire West Safeguarding Children Partnership -

https://bracknellforestsafeguarding.org.uk/

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on part 1 of the Department for Science, Innovation and Technology and the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person.

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

For pupils in EYFS: If a pupil is absent for a prolonged period of time, or if a child is absent without notification from the parent of carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked

into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our trust has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening. There should be a zero-tolerance approach to abuse, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying e.g. racism, faith targeted abuse)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos including those generated using AI
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7.14 about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.7 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

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 of terrorism 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.
There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.11 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

Harmful sexual behaviours can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap. Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse, exploitation or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual children, or children questioning their gender are at greater risk.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.14 – 7.19 set out more detail about our school's approach to this type of abuse.

TKAT will discuss the local response to HSB, sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the child protection policy.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation.

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence.

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. The nature of voluntary roles varies, so schools

should undertake a written risk assessment and use their professional judgement and experience when deciding what checks, if any, are required. Details of the risk assessment should be recorded. The Volunteer policy gives more information about safeguarding processes regarding volunteers in school.

Visitors are expected to sign the visitors' book and wear a visitor's badge. The signing in process will include notifying visitors of which staff are part of the DSL team in school.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. Where possible the school will make use of known speakers and groups to provide curriculum enrichment opportunities. School staff will discuss the content of presentations/workshops with a visiting speaker before the visit begins to assess that the content is age appropriate. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Contact the child's parents/carers and any other given contacts
- School staff to supervise them at school until collected
- SLT to be informed of non-collection
- Contact social services for further advice before locking up time
- Record the incident on the school's MIS system e.g. Arbor or SIMS if collection is prior to locking up time
- Record the incident as a safeguarding concern on CPOMS if social services are involved

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact the child's parents/carers and any other given contacts
- Liaise with parents to resolve the situation, providing support
- Search the school site and surrounding areas
- Inform the police and ask for support
- Notify the CEO and Chair of Governors if the pupil has not been located within 30 minutes
- Record the incident on CPOMS, carry out an investigation report to safeguarding governor and implement lessons learned