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Hayes School
Child Protection & Safeguarding Policy

Owner (job role):	Director of Education
Approval Body:	Trust Board
Approval Date:	14 July 2026
Implementation Date:	1 September 2026
Review Date:	July 2027

Inspire, Respect, Flourish.

Version	Approval Date	Summary of Changes
V1	13/09/2023	Keeping Children Safe in Education 2023
V2	09/07/2024	Keeping Children Safe in Education 2024
V3	15/7/2025	Keeping Children Safe in Education 2025 Section 2 Introduction - Referenced a new glossary of key safeguarding terms and acronyms Appendix 5 Section 3 Aims - Added new Impact vision Replaced 'Peer on peer' with 'Child on child' 5.1,5.5,5.6 Roles and Responsibilities - Added bullet points on filtering and monitoring responsibilities Section 6 Legislation and Guidance - Added reference to: • Human Rights act • Equality act • Generative AI Product safety expectations DfE • Working together to improve school attendance DfE Section 8 Links to other policies - Added: AI Policy and EYFS Policy Section 17 Host families – homestay during exchange visits - Amended section 'homestays suitability of UK host families' Section 19 Online safety - Added to the 4 categories of risk - 'content' section - Schools should now be aware of risks related to: Misinformation Disinformation (including fake news) Conspiracy theories Added 19.1 Artificial Intelligence (AI) paragraph Section 23 Supporting pupils - Added section 23.4 'Pupils who are lesbian, gay, bisexual, or gender questioning' -Added section 23.5 'Pupils attending Alternative Provision'
V4	Sept 2026	Keeping Children Safe in Education 2026

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1. Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Trust-level		
Chair of trustees	John Phillipson	c/o clerk@imat.uk
Link Trustee for safeguarding	Kieran Osborne	c/o clerk@imat.uk
Chief Executive Officer	Sarah Lewis	info@imat.uk
Local / National Support		
Bromley Local Authority Designated Officer (LADO)	Gemma Taylor	0208 461 7775 or 0208 313 4325 lado@bromley.gov.uk
Bromley Local Authority Safeguarding Officer	Libby Kember	0208 313 4665 Mobile 07974 870 800 Libby.kember@bromley.gov.uk
Urgent safeguarding referrals should be made to: Bromley Children and Families Hub Bromley Safeguarding Children Partnership	NA	020 8461 7373 / 7379 / 7026 access the portal to make a referral Children, Young People and Families Portal Out of Hours (emergencies only): 5.00pm – 8:30am and weekends: 0300 303 8671 Bromley LSCB - Our Policies, Procedures and Guidance
Extremism in Schools Helpline for Teachers	NA	0207 340 7264 Counter.extremism@education.gov.uk
NSPCC dedicated helpline	NA	0808 800 5000
School Name Here		
Designated Safeguarding Lead (DSL)	Oliver Robbins	omr@hayes.bromley.sch.uk
Deputy Safeguarding Lead (DDSL)	Kate Tregidgo	kxt@hayes.bromley.sch.uk
Chair of Local Governing Body	Janice Pigott	jpigott@hayes.imat.uk
Local Governing Body Link Governor for safeguarding	Cath Perrott	cperrott@hayes.imat.uk

2. Introduction

The trustees and governors of Impact Multi Academy Trust are committed to safeguarding and promoting the welfare of children and young people and require all staff and volunteers to share this commitment to a whole-school and whole-Trust approach to safeguarding.

This policy complies with our funding arrangement and articles of association and will be reviewed and updated annually.

A glossary of key safeguarding terms and acronyms is provided in Appendix 5 to support understanding of terminology used throughout this policy.

3. Aims

This policy is aligned to our trust's vision and values:
Our Impact vision: Together we enable everyone to thrive.

Our Impact values:

- Ambition – we have high aspirations for our children and strive to do our very best.
- Inclusion – we care about the whole child, and everyone will feel that our Trust is a place where they are valued, respected, safe and happy.
- Collaboration – we are stronger together and collaborate generously to ensure the long-term success of our children, our staff, our schools and the communities we serve.
- Trust – we build trust by acting with integrity and kindness and by putting children first.

Inspire, Respect, Flourish.

The trust aims to ensure that:

- Our schools provide a caring, positive, safe and stimulating environment, which promotes the wellbeing of the community and the individuals within it.
- All staff, supply staff, trainee teachers, volunteers, pupils, visitors and contractors are aware of their responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- We practise safer recruitment and check the suitability of staff (including supply staff and trainee teachers) and volunteers.
- We provide a systematic means of monitoring children known or thought to be at risk of harm in the form of drugs, gangs, neglect, child criminal exploitation (CCE), child sexual exploitation (CSE), physical and emotional abuse including 'Honour-based' abuse, Female Genital Mutilation (FGM), forced marriage, County Lines, Child-on-child abuse (including harassment and violence) and radicalisation, including pupils with SEND and additional needs.
- Effective systems are in place for reporting and recording concerns.
- Children and young people within our schools have access to early help and support.
- Schools contribute effectively to inter-agency work and provide additional support to children. subject to child protection plans and children in need, in line with statutory guidance 'Working together to safeguard children' 2023.
- Schools actively cooperate and contribute to a Local Authority's Section 17 or Section 47 assessment and Section 11 audits.

4. Definition of safeguarding

Safeguarding and promoting the welfare of children is defined as the following:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Children includes anyone under the age of 18.

5. Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, supply staff, trainee teachers, volunteers, contractors, local governors and trustees across our trust. Our policy and procedures also apply to contractors, extended school and off-site activities.

5.1 All staff

All staff will read and understand Part 1 Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- The name(s) of staff responsible for child protection and their role and the name of the Designated Safeguarding Lead.
- Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the role and identity of the Designated Safeguarding Leads (DSL) and Deputy DSLs, and the safeguarding response to children who go missing from education.
- Other relevant policies including the Staff Disciplinary Policy, Staff Code of Conduct and Grievance Policy, the individual school's Behaviour Policy and any additional policies in place regarding online/e-safety
- The early help process (sometimes known as the common assessment framework) 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.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What process to follow if they identify a safeguarding issue or a child discloses to them that they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals The school's responsibilities under mandatory reporting legislation relating to child sexual abuse, including their duty to report disclosures, known incidents and reasonable grounds for suspecting child sexual abuse in accordance with current statutory requirements.
- The signs and indicators of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation (see KCSiE Part one).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The wider environmental factors, which can influence behaviours of pupils creating safeguarding concerns. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This contextual safeguarding will help assess whether wider factors are a threat to the safety and/ or welfare.

of the pupil.

- The risks children and young people face online how they can be supported and taught to stay safe online.
- The filtering and monitoring systems in place in the school.
- Data protection and how to store and share information safely, including information, which is sensitive and personal, in accordance with General Data Protection Regulations (GDPR).
- Principles for information sharing which mean that in safeguarding children, information can be shared, without consent, where there is good reason to do so and where the sharing of information will enhance the safeguarding of the child (without delay and where gaining consent could put the child at risk).
- Children and young people who staff should be particularly alert to the potential need for additional support for a child who:
    - is disabled or has certain health conditions and has specific additional needs
    - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
    - has a mental health need
    - is a young carer
    - is pregnant and / or is a parent themselves
    - has exhibited early signs of abusive, violent and/or harmful behaviours
    - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
    - is frequently missing/goes missing from education, home or care
    - has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
    - is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
    - is at risk of being radicalised into terrorism
    - has a parent or carer in custody, or is affected by parental offending
    - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
    - is misusing alcohol and other drugs themselves
    - is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
    - is a privately fostered child.

5.2 The Designated Safeguarding Lead (DSL)

Each school has a DSL who is a member of the Senior Leadership Team (SLT). Each DSL is named above in 'Important Contacts'. The DSLs take lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. They can also be contacted via email out of hours, or by telephone, in emergencies. Staff members within each DSL's school and key trust personnel will have the DSL's phone number. When the DSL is absent, the Deputy DSL will act as cover.

The Designated Safeguarding Lead (DSL) is responsible for raising awareness of safeguarding, the co-ordination of child protection procedures and management of the liaison with Children's social care and other agencies. This includes all the below:

- Providing advice and support to other staff on child welfare and child protection matters, taking part in strategy discussions and inter-agency meetings – and/or supporting other staff to do so – and contributing to the assessment of children.
- Providing up to date relevant training and advice to new and existing members of staff on the school's safeguarding arrangements, safeguarding and the latest policies, including changes to Keeping Children Safe in Education.
- Ensuring all temporary staff and volunteers who work with children in the school are made aware of the school's arrangements for child protection and their responsibilities.

- Ensuring that all staff have access to this policy and have acknowledged that they have read and understood it.
- Ensuring all staff are familiar with the process for making referrals
- Ensuring referral of cases of suspected abuse to the local authority children's social care and the
- Local Area Designated Officer (LADO) for child protection concerns (all cases which concern a staff member)
- Adhering to the Bromley Safeguarding Children Partnership, Local Authority, London Children Safeguarding Partnership Board, and school's procedures with regard to referring a child if there are concerns about possible abuse.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral. Ensuring that all such records are kept confidentially and securely and are separate from pupil records (on CPOMS/MyConcern). Ensuring that an indication of further record keeping is marked on the pupil record. Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached (including the rationale for those decisions) and the outcome.
- If a decision was reached to take no action this also needs to be recorded with the reasons why. Know and follow the local arrangements set by local safeguarding partners, Local Authority, Clinical Commissioning Group and Chief Police with the Local Authority.
- Developing effective links with relevant agencies and co-operating as required with their enquiries regarding child protection matters including attendance at case conferences/core group meeting
- Ensuring operation of the 'First call' system in which any pupil currently subject to a child protection plan, who is absent without explanation, is referred to Children's Social Care.
- Making a referral to children's social care immediately if, at any point, there is a risk of immediate serious harm to a child (within the home environment or extra-familial harm). In the first instance, this would usually be made through the DSL/Deputy DSL. However, if the situation warrants an immediate referral, for example, if out of hours, or the designated person (or persons) is unavailable, then a referral should be made by the individual staff member to the Children and Families hubAttending Child Protection Conferences whenever possible, or sending a suitable representative from the school, or a written report if attendance is not possible.
- Completing relevant case conference paperwork and sending to the Quality Assurance Unit for the Conference Chair at least 48 hours prior to the meeting. Sharing the conference report with parents and carers ahead of conference and allowing opportunity for comment. Ensuring staff are regularly updated about pupils deemed to be vulnerable within school, whilst being mindful of data protection requirements.
- Ensuring that when pupils transfer to the school, the school obtains confirmation from the former school whether there are any safeguarding issues to be aware of through written confirmation.
- Ensuring that when a pupil leaves the school, their child protection file is copied to the new education establishment within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The DSL should ensure secure transit, and confirmation of receipt should be obtained.
- Ensuring pupils who are on a child protection plan know where and how to locate the DSL or Deputy DSL if they have any concerns.
- Disclosing any information about a pupil to other members of staff on a need-to-know basis only.
- Ensuring that when a child, who is subject to a child protection plan, leaves the school, their information is transferred to the new school immediately and relevant agencies, (including social workers) are informed, where involved. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.
- Where a child needs a social worker, ensuring that this information is used to make decisions in the best interests of the child's safety, welfare and educational outcomes.
- Liaising with the headteacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
  Ensure that an adult is present during police investigations in school to safeguard the rights, entitlements and welfare of children and young people (see Appropriate Adult guidance)
- Understanding the filtering and monitoring processes in place in school and ensure these are reviewed annually. Reviews should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

5.3 The Chief Executive Officer (CEO)

The CEO will:

- Ensure the review of this policy, at least annually (and in response to any changes in guidance or lessons learned)
- Ensure an annual safeguarding audit is carried out in each of the trust schools
- Remedy deficiencies in the school's and trust's safeguarding systems without delay, where necessary
- Work with the Head of HR to ensure safer recruitment practices are followed, allegations or concerns against adults are appropriately managed, liaising with the Local Authority Designated Officer (LADO) in the event of an allegation made against the Headteacher in any school.

5.4 The Board of Trustees

The Trust board has a statutory duty to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. They will facilitate a trust-wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The Trust board will:

- Evaluate and approve the policy at each review
- Appoint a link Trustee for safeguarding to monitor the effectiveness of this policy in conjunction with the full Trust board and to work with safeguarding link governors to support effective practice across the Trust
- Ensure all Trustees and local governors read Keeping Children Safe in Education and complete training on induction and at regular intervals

5.5 Local Governing Bodies

Governors will ensure the implementation of this policy and the effectiveness of procedures within schools.

Local governing bodies will:

- appoint a member of each local governing body to act as the governor responsible for safeguarding
- liaise with the school DSL on local safeguarding issues
- report to the link Trustee for safeguarding.
- 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
- Ensure the school has appropriate filtering and monitoring systems in place and regularly review their effectiveness
- hold the Headteacher to account for its implementation.

5.6 The Headteacher

The Headteacher is responsible for the implementation of this policy at the school, including:

- Ensuring that staff (including temporary staff, supply staff and trainee teachers) and volunteers:
    - are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect or exploitation
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly. This includes training around filtering and monitoring.
- Ensure that the leadership team and relevant staff know the filtering and monitoring systems in place, how to manage them effectively and how to escalate concerns when identified.

- 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 2)
- Ensuring the relevant staffing ratios are met, where applicable
- Approving the content of drama performances and presentations to ensure that they are suitable for the age group performing it and the audience. This is a requirement for secondary examination performances and the Head of Centre is required to sign a declaration before an assessor will assess examination performances. The school will approve the content of all school productions/performances to ensure that any elements of possible abuse themes (e.g. obscene language, violence, nudity and sex) are appropriate and integral to the performance.
- Making sure each child in the Early Years Foundation Stage is assigned a key person

6. Legislation and statutory guidance

- This policy is based on the Department for Education's statutory guidance Keeping children safe in education 2026: September 2026, Working Together to Safeguard Children,https://www.gov.uk/government/publications/governance-handbookhttps://www.gov.uk/government/publications/governance-handbook Academy trust governance guide - Guidance - GOV.UK (www.gov.uk)

- This policy also links to the following legislation and guidance:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies to safeguard and promote the welfare of pupils at the school

- The Children Acts 1989 and 2004, which provide a framework for the care and protection of children

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including 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 making 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

- 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

- 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

- Data Protection Toolkit for Schools 2023, providing guidance to support schools with data protection activity, including compliance with the GDPR.

- Teaching Online Safety in School 2023, which provides guidance to support schools to teach pupils how to stay safe online when studying new and existing subjects

- Voyeurism (Offences) Act 2019 (commonly known at the Upskirting Act)

- Preventing Youth Violence and Gang Involvement

- Generative AI: product safety expectations - GOV.UK

- Working together to improve school attendance - GOV.UK

- Relationships and sex education (RSE) and health education - GOV.UK

- Modern slavery: how to identify and support victims - GOV.UK

- Supporting pupils with medical conditions at school - GOV.UK

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

This policy is also in accordance with the locally-agreed procedures of Bromley Safeguarding Children Partnership (BSCP), specifically:

- London Borough of Bromley's Thresholds of Need.
- Early Help Assessment
- Bromley Children Project (BCP) Request for Early Support: BCP Family Support Referral Form

7. Safeguarding Partners

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:

- The local authority (LA)
- Integrated Care Borad (ICB) for an area within the LA
- The chief officer of police for a police area in the LA area

8. Links to other policies

This policy should be read in conjunction with the following School or Trust level policies or procedures:

- IT Acceptable Use Policy
- Artificial Intelligence (AI) Policy
- Allegations of abuse against staff
- Attendance and Punctuality
- Behaviour Management
- Complaints Policy
- Disciplinary policy
- Designated Teacher for Looked After Children Policy
- Equality, Diversity & Inclusion Policy
- Examinations Policy
- EYFS Policy
- First Aid and Medicines (Supporting Pupils with Medical Conditions)
- Allergy management Policy
- Health and Safety
- Management and Retention of Records Policy
- Online Safety/E-Safety
- Privacy Notices
- Relationships, Sex and Health Education Policy
- Social Media and Networking (Online Policy)
- Special Educational Needs
- Safer Recruitment
- Staff Code of Conduct

9. Equality statement

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

- Have special educational needs (SEN) or disabilities or health conditions (see section 27.1)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 27.4)
- Are missing from education
- Have a parent/carer who has expressed an intention to remove them from school to be home educated

10. Confidentiality

The trust observes strict confidentiality in relation to personal data. More information can be found in our Data Protection, Data Retention and Privacy Notices policies.

The Trust recognises the statutory Information Sharing Duty and will ensure information is shared proactively, proportionately and in a timely manner where this supports safeguarding and promotes children's welfare.
The trust follows the principles below:

- Timely information sharing is essential to effective safeguarding
- 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
- The Data Protection Act (DPA) 2018 and the General Data Protection Regulations do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- Practitioners may share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and if to gain consent would place a child at risk.
- 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
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and the Information Commissioner's Office (ICO) guide to sharing information to safeguard children and young people in the education sector in the UK will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy DSL)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 10

11. Training

11.1 All staff

All staff members will undertake safeguarding and child protection training at induction and annually, including 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 or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards (for teaching staff) 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

This training will include updates on mandatory reporting duties relating to child sexual abuse, including legal obligations, procedures for reporting concerns and the consequences of failing to comply with statutory reporting requirements. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates from the DSL, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. Volunteers will receive appropriate training, if applicable.

11.2 The DSL and Deputy DSL

The DSL and Deputy DSL will undertake at least Level 3 child protection and safeguarding training at least every 2 years and Prevent training. 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). They will also undertake Prevent awareness training.

11.3 Trustees and local governors

All trustees and local governors receive training about safeguarding at induction, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. This enables them to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and robust. Training is regularly updated. In the event that the chair of trustees is required to act as the 'case manager', they will receive support from our Governance Support partner and/or legal support in managing the allegation.

12. Management of visitors, contractors and letters

All contractors and visitors to the schools are required to report to the reception/premises staff on their arrival.

All visitors will be required to verify their identity to the satisfaction of staff. 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.

Visitors will be provided with key information about expectations regarding safeguarding on entry to the school at reception and are expected to sign the visitors' book or sign in and out via the digital system which also confirms that they understand the required expectations. All schools have appropriate identification for employees and visitors for easy identification. Visitors will be issued with visitor identification, which they must wear at all times. Staff and children should feel confident in challenging anyone in school without an ID badge/lanyard on display.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists, 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 (or the Trust's central team), will provide prior written confirmation that an appropriate level of DBS check has been carried out
- All employees of school or Trust appointed contractors are required to have DBS clearance. Contractors will be informed of this by the Premises team when quotes are submitted for work.
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.
- Those hiring school facilities and providing activities for children and young people will be required to provide child protection and safeguarding policies and evidence of DBS checks for staff and volunteers as a condition of hire. Failure to comply with this would lead to the termination of the agreement. This applies to all activities involving children and young people on the school site, irrespective of whether the children are those on roll at any of the trust's schools. Schools will refer to the guidance, Keeping Children Safe in Out of School Settings.

13. Visiting Speakers

Outside speakers are invited into schools on occasion from the wider community for a range of purposes, including (but not limited to):

- enrich pupils' experience of school
- provide information that helps them make decisions at different phases of their education
- widen their understanding of world and global issues
- providing motivational inspiration through the sharing of a speaker's experience

The Prevent Statutory Guidance requires schools to have clear protocols for ensuring that visiting speakers, who might fall within the scope of the Prevent Duty, whether invited by staff or pupils, are suitable and appropriately supervised.

We will not invite into the schools 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.

This means that even in cases where specific vetting checks are not prescribed by Keeping Children Safe in Education September 2026, speakers will not be left alone with pupils and schools must take action to ensure that they are suitable.

- All requests for outside speakers must be approved by the Headteacher and/or the DSL (see Appendix 3)
- There should be a clear purpose for inviting the speaker into school and clear guidelines agreed for the content of the speaker's input. The content of the speaker's programmed visit must comply with the school's ethos and core values of British values.
- The school will check the work of the agency or visitor is known to them and be considered suitable.
- Research will be carried out on the speaker and any organisation they represent or are employed by, including voluntary organisations (checks may comprise internet searches, searches of social media and contact with other schools who have invited the speaker into their school.)
- If possible, a biography of the speaker should be obtained.
- If the speaker is going to work with a small group of children they must have DBS clearance.
- The speaker and the school should agree and plan for the teacher (or teachers) to be present throughout the visit so that they are able to deal with any follow up questions or concerns.
- The visiting speaker will be provided with relevant information on the appropriate key stage, the age of the pupils, the approximate number of the pupils in the group, any special requirements of the pupils, and details of the venue where the session will take place as well as the resources that may be required.

14. Guidance for Governors, Trustees and Volunteers

Our policy applies to all staff, governors, trustees and volunteers working in the school. School governors and trustees should be mindful of the following when visiting or liaising with pupils of the school.

- Meetings with pupils in school should be in the presence of another adult or member of staff,
- Governors/trustees should not share personal contact details with pupils.
- No contact should be made with pupils via social media.
- No photographs of pupils should be taken by governors/trustees on personal phones or cameras.

We are aware that for parent governors and staff governors some of the above will be unavoidable in their parental role or role as a member of staff.

15. Curriculum

Our schools ensure that children are taught about how to keep themselves and others safe, including online through our Personal Development, Relationships, Sex and Health Education curriculum. This preventative education will be tailored to the specific needs of children in our schools at age-appropriate stages and will prepare them for life in modern Britain and the wider world.

The culture and ethos within our schools promote trust, respect and acceptance. We have a zero tolerance for:

- Sexism

- Racism
- Hateful behaviour or language relating to someone's disability or any other protected characteristic. Misogyny/misandry including violence against women and girls (VAWG)
- Homophobia
- Biphobia
- Sexual violence and harassment
- Derogatory behaviour or other forms of physical violence and conflict

Children will be taught about topics, including:

- 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
- what constitutes sexual harassment and sexual violence and why these are always unacceptable
- the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence and abuse such as forced marriage and Female Genital Mutilation (FGM), and how to access support.

16. Sport

Trust schools may provide single-sex sports where appropriate for reasons of safety or fairness, in line with the Equality Act 2010. When done for reasons of safety there will be no exceptions to single sex groups. Requests for alternative participation when single sex groups are being used for reasons other than safety will be considered on a case-by-case basis, with the child's best interests and the impact on others taken into account.

17. Premises

Trust schools provide separate toilet and changing facilities for boys and girls over the age of 8 in line with statutory requirements and safeguarding duties. Pupils will use facilities designated for their biological sex. Where a pupil requests alternative arrangements, these will be considered on a case-by-case basis. Any provision will maintain the safety, privacy and dignity of all pupils and will not compromise single-sex facilities. Decisions will be recorded and reviewed regularly.

The school ensures appropriate supervision, risk assessment and age-appropriate arrangements, including that pupils aged 11 and over do not undress in front of the opposite sex.

18. Residential accommodation

Trust schools will not allow a child to share overnight accommodation with a child of the opposite biological sex. Responding to a request to support any degree of social transition must not include allowing access to residential accommodation designated for the opposite sex. If, however, a child does not want to share a room with another child of the same biological sex, alternative arrangements should be sought where possible. Alternative arrangements should not compromise the safety, comfort, privacy or dignity of any child. They might include, for instance, finding a suitable separate room for the child.

Where a child's concern reflects a request for support with social transition, schools will consider the section on considering requests for support with social transition before making any decisions.

19. Host Families – homestay during exchange visits

Homestays are when a pupil stays in another family's home as part of a foreign exchange trip. These are sometimes organised through our secondary schools. Where pupils participate in homestays as part of a foreign exchange visit or sports tour organised by or through our secondary schools, our schools have a duty to safeguard children's welfare.

19.1 School-Arranged Homestays – Suitability of UK Host Families

When arranging homestays, schools will assess the suitability of adults in host families responsible for visiting pupils. Schools will:

- Ensure host families have read and understood the Trust's Safeguarding Policy
- Provide clear guidance on how and where to report safeguarding concerns
- Provide information on who to contact during a homestay should an emergency occur, or a situation arise which makes them feel uncomfortable.

19.2 Homestay – suitability of adults in host families abroad

Schools must take reasonable steps to ensure the suitability of the overseas accommodation. This includes:

- Partnering with reputable organisations abroad
- Gathering information about the host family
- Ensuring clear communication with parents about the arrangements in place for the visit and safeguarding measures
- Provide information on who to contact during a homestay should an emergency occur, or a situation arise which makes them feel uncomfortable.

20. Reasonable force

There are limited circumstances when it is appropriate for staff in our schools to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances.

In line with DfE advice and for further information see Impact Trust Primary behaviour policy and Impact Trust Secondary behaviour policy section 'Restrictive Intervention: Reasonable force and Restraint'

21. Mental Health

Mental health is as important as physical health, and we recognise the importance of good mental health for the safety and wellbeing of our staff and pupils.

Mental health problems can in some cases develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. We also recognise that, in a small number of cases, poor mental health can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriate trained professionals should attempt to make a mental health diagnosis. School staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing, or at risk of developing, mental ill health. If a child is struggling with their mental health, self-harming, has 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 placed to recognise. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Schools can also access advice via the following Links:

- Targeted support: guidance and hub : Mentally Healthy Schools
- Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK
- Preventing bullying - GOV.UK
- Children's mental health - Every Mind Matters - NHS
- Mental Health Support Network provided by Chasing the Stigma | Hub of hope

If a member of staff suspects that a child may be experiencing, or at risk of developing, mental ill health then they should report this to the safeguarding team through the usual channels. If staff feel that a child is in danger, they should call 999.

Alongside this we have a responsibility to support and promote positive mental health and wellbeing of our pupils, including through PSHE, the wider curriculum and assemblies.

22. Online Safety

The Trust recognises that cyber security is an important safeguarding consideration. Schools will take reasonable steps to protect systems and personal information through appropriate cyber security measures and staff awareness.

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

The 4 key categories of risk

- Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact – being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If schools feel pupils, students or staff are at risk, they should report this to the Anti-Phishing Working Group (https://apwg.org/).

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

- Ensure Filtering and monitoring systems are in place.
- Ensure the DSL/DDSL are notified of all monitoring alerts.
- Ensure filtering systems block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - 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
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our school 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
- 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

- 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 trust's ICT systems and use of their mobile and smart technology
- 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
- 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 (All incidents of sexual images should be reported to a member of the safeguarding team. The image(s) and the device they are stored within should be confiscated. No member of staff should attempt to view these images as to do so would constitute a criminal offence see Annex 1)
- 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 and regularly review the effectiveness of these.
- Train staff on their expectations, roles and responsibilities around filtering and monitoring systems.
- 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

In line with DfE guidance pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime. For further information See the Trust Online Safety Policy and Primary Behaviour Policy/Secondary Behaviour policy.

23 Artificial Intelligence (AI)

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 ChatGPT.

Our 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. Schools will take reasonable steps to ensure that pupils use AI safely, critically and appropriately. Staff should be aware of the safeguarding risks linked to "cognitive offloading", where pupils rely excessively on AI tools to think, complete work or solve problems instead of developing their own knowledge, judgement and resilience. Excessive reliance on AI may reduce opportunities for pupils to seek help from trusted adults, teachers or peers and may increase the risk that safeguarding concerns, emotional distress or disclosures are missed.

Schools recognise that some AI chatbots and companion-style technologies are intentionally designed to encourage emotional attachment and simulated relationships. Vulnerable pupils may develop unhealthy emotional dependence on these systems in ways that can undermine healthy social development, reduce interaction with trusted adults and increase isolation. Staff should remain professionally curious where pupils appear overly reliant on AI technologies for emotional support, reassurance or companionship.

Staff should also be alert to safeguarding risks associated with:

- AI-generated deepfakes and manipulated imagery;
- AI-generated child sexual abuse material or sexualised imagery;
- the creation or sharing of nude or semi-nude AI-generated images;
- AI-assisted grooming, impersonation or exploitation through chatbots or avatars;
- misinformation, disinformation and extremist content generated through AI systems;
- bullying, harassment or abuse facilitated through generative AI tools.

The Trust will treat incidents involving AI-generated nude or semi-nude imagery in the same way as other incidents involving sexual imagery (see section 25). Schools will provide age-appropriate education to pupils about the safe, ethical and responsible use of AI, including:

- critical thinking and verification of AI-generated information;
- understanding bias, misinformation and hallucinations in AI systems;

- protecting personal information and privacy;
- recognising manipulative or exploitative online behaviour;
- the importance of maintaining healthy relationships with trusted adults and peers rather than relying on AI tools for emotional support.

Staff will receive regular safeguarding updates and training regarding emerging AI risks, including developments in generative AI technologies and associated safeguarding concerns.

Our schools will treat any use of AI to access harmful content or bully pupils in line with this policy and our Behaviour policy. Staff should be aware of the risks of using AI tools whilst they are still being developed and refer to our Trust AI Policy for further information and guidance.

24. Prevent

We have zero tolerance of extremist behaviour and ensure that our curriculum, care and guidance empower young people to reject violent or extremist behaviour. All staff complete the Prevent training (online) on joining the school and receive regular subsequent training on Prevent.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of the armed forces.

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

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

Schools are expected to assess the risk of children being drawn into terrorism including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. As a minimum, however, schools should ensure that the DSL undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering and monitoring is in place.

It is also important that schools teach pupils about online safety more generally. School staff should understand when it is appropriate to make a referral to Channel and Prevent Multi-Agency Panel (PMAP). Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible and at risk of being drawn into terrorism. It provides a mechanism for schools to make referrals. An individual's engagement with the programme is entirely voluntary at all stages.

Our schools acknowledge protection from radicalisation and extremist narratives as a safeguarding issue. We recognise that we have a duty of care towards our pupils and that safeguarding against radicalisation and extremism is one of those duties. Exposure of children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence.

"Safeguarding vulnerable people from radicalisation is no different from safeguarding them from other forms of harm." Home Office – The Prevent Strategy. Since 2012, it has been required by law for teachers "not to undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs."

Teachers must not promote partisan political views in the teaching of any subject and are required to ensure that whenever political issues are brought to the attention of pupils a balanced presentation of the opposing views is offered. This requirement applies not only during scheduled lessons but in all other contexts.

We recognise that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. The child in these circumstances may feel helpless and humiliated and may feel self-blame or be withdrawn or isolated within the community. We recognise that the school may be the only stable environment in the lives of children who have been abused or who are at risk of harm. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive. Staff should be aware that safeguarding incidents/behaviours can be associated with factors outside the family home and school and also between children and should consider the safeguarding risk of the pupils' context.

The DSL and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help DSLs and Deputy DSLs understand when they should consider calling the police and what to expect when they do.

Any discrimination, prejudice or extremist views, including offensive language, shown by pupils or staff will be dealt with in line with our behaviour management policy and code of conduct, and will always be addressed.

25. Allegations against another pupil Child-on-child abuse (including harassment and violence)

Our schools recognise that allegations can be made against other children in the form of child-on-child abuse. Child on child on peer abuse is likely to include, but may not be limited to, bullying (including cyberbullying), physical abuse (hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm), sexual violence, harm and/or harassment, consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes upskirting (typically this involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm) and initiation type violence and rituals. Child-on-child abuse (including harassment and violence) is a safeguarding issue for both the victim and alleged perpetrator.

Our trust is clear that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or part of growing up. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter' or 'just having a laugh', 'part of growing up' or 'boys being boys' can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. The trust recognises that child on child sexual violence and sexual harassment will be dealt with according to Part Five of Keeping Children Safe in Education (2026).

Trust schools recognise that Child-on-child abuse (including harassment and violence) may take place on school site as well as in the community. The Trust recognises that, in some cases, child-on-child abuse concerns may not meet the threshold for referral to statutory services but may still require timely intervention and support. Pupils involved may benefit from Early Help, pastoral intervention, targeted school support, or signposting to universal and community-based services.

Schools within the Trust will work proactively with pupils, parents/carers, local authorities and partner agencies to ensure that appropriate support is identified at an early stage. This may include support through health services, family support services, youth services, family hubs, mentoring, counselling, after-school provision or other local community services.

When an allegation is made by a pupil (or an adult) against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. When there is a safeguarding concern, the DSL/Deputy DSL should be informed, and any decisions will be made on a case-by-case basis.

A record should be made of the allegation, and appropriate initial enquiries may be undertaken by the DSL or a designated member of staff to establish the basic facts. These enquiries should be limited to determining whether the concern may constitute child-on-child abuse and whether it meets the threshold for referral to external agencies (e.g., LADO or police). Any further investigation should only proceed following consultation with the relevant external agencies. Children's Social Care may be contacted to discuss the case. The DSL/Deputy DSL will follow through the outcomes of the discussion and make a Children's Social Care referral where appropriate.

- A record of the concern will be kept on both pupils' school file.
- If the allegations indicate a potential criminal offence, the police should be contacted at the earliest opportunity and parents/carers informed (of both the alleged perpetrator and the alleged victim
- It may be appropriate to suspend or exclude the perpetrator in accordance with the School's behaviour policy and procedures.
- It maybe appropriate for a student/(s) to be temporarily forbidden from the premises in certain circumstances in order to separate children for safeguarding reasons.

26. Reporting and acting on concerns

All members of staff have a duty to report their concerns, as soon as possible, to the DSL/Deputy DSL. They can be contacted via telephone or email. All staff need to report the safeguarding concern using the system in place within the school.

Staff, supply staff, trainee teachers, volunteers, trustees and local governors must follow the procedures set out below in the event of a safeguarding issue.

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

It is essential that all adults who come into contact with children and young people in our schools are vigilant and exercise professional curiosity for the following reasons:

- Children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected.
- Children may not recognise their experiences as harmful
- Children may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability or sexual orientation or language barriers.

Staff should report concerns, however minor, to the DSL, especially since they can help build a picture of need. We value the importance of building trusted relationships with children and young people since these facilitate communication.

Where concerns arise regarding serious violence, weapon carrying, threats involving weapons or associated criminal exploitation, the DSL will assess risk, consider safeguarding responses and implement appropriate safety and support planning.

In cases where concerns have arisen about a pupil, group of pupils or staff member these must always be referred to the Designated/Deputy Safeguarding Lead. They in turn will seek advice from the Children and Families Hub, the Local Authority Designated Officer and/or the Education Safeguarding Officer within the LA as appropriate.

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

The child should be kept safe and immediate contact should be made with the DSL to share the concern(s). Referrals should be made to Bromley Children and Families Hub immediately (see Important Contacts for contact details).

A referral should be made to children's social care and/or the police immediately if it is believed that a child is suffering or likely to suffer from harm, or in immediate danger.

A referral will normally be made by the DSL but anyone can make a referral to Children's Social Care or make contact with the police.

- Do not at this stage consider arranging an Early help assessment or a multi-agency response.
- Tell the DSL as soon as possible if you make a referral directly.
- See the referral requirements for specific safeguarding incidents below.

The Trust recognises that a referral to social care may be made in response to extra-familial risks and is committed to communicating this to parents/carers, as appropriate.

26.2 If a child makes a disclosure to you

All staff must be aware that they have a professional responsibility to share information with otheragencies in order to safeguard children.

If a child discloses a safeguarding issue to you, you should follow the guidance in Appendix 1

All staff are expected to make a written record of any disclosures or concerns as soon as practicably possible after the concern arises on MyConcern or CPOMS. This written record should provide a clear and comprehensive summary of the concern as well as any action that they have taken or intend to take.

Body Maps should only be used to document and illustrate visible signs of harm and physical injuries on a child, and usually when the child has disclosed that someone has hurt them. The body map document should be used where an injury to the child is observed and, when completed, should be filed with the appropriate concern report.

Report the concern at the earliest opportunity to the DSL.

Alternatively, if appropriate, make a referral to children's social care (and the police, if appropriate) 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

26.3 If you have concerns about a child

(as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)
Where possible, report your concerns and/or speak to the DSL first to agree a course of action.Action will normally be taken by the DSL. However, 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. Share details of any actions you take with the DSL as soon as practically possible.

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

26.4 Escalation to Referral

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. Referrals should be made to Bromley Children and Families Hub immediately (see Important Contacts for contact details).

If you make a referral directly you must tell the DSL as soon as possible. The local authority will 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. 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.

https://childrensportallcs.bromley.gov.uk/web/portal/pages/homemailto:candfhub@bromley.gov.ukRefe rrals can be made, and advice sought from Bromley Children and Families Hub (C&F Hub):

Telephone: 020 8461 7373 / 7379
Email: candfhub@bromley.gov.uk
Address: Bromley Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley, BR1 1AS
Online: Bromley Children's Portal
Out of Hours: Emergency Duty Team (5.00pm–8.30am and weekends) 0300 303 8671

The Schools' safeguarding personnel are aware that when making referrals to Children's Social Care we must:

- Ensure all referrals are responded to
- Re-refer and/or contact the Designated Head of Service if the school does not consider the response to be adequate
- Use external agencies to support referrals that do not meet the threshold

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in the Bromley FGM guidance document
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. Unless they have been specifically told by the police not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate. 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.

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. Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL who will follow our safeguarding procedures, to include making a referral if required.

26.6 Mandatory Reporting of Child Sexual Abuse

In accordance with current statutory requirements, all staff must understand their responsibilities regarding the mandatory reporting of child sexual abuse. Where a member of staff receives a disclosure of child sexual abuse, witness's child sexual abuse, or has reasonable grounds to suspect that child sexual abuse has occurred, they must report this concern immediately in line with this policy and statutory guidance.

Staff must not assume that another person has made a report. Concerns should be reported without delay to the Designated Safeguarding Lead (DSL) and recorded using CPOMS/My Concern. Where legislation requires a direct report to an external agency, staff must comply with that duty and inform the DSL as soon as possible.

26.7 If you have concerns about extremism

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.

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 Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. Consent will be required before any support through the programme is provided.

If you are concerned that someone is at risk of becoming radicalised and/or involved in terrorism, you can:
• Call the ACT Early Support Line on 0800 011 3764 - share your concerns in confidence with specially trained officers.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

26.8 Early help

If early help is appropriate the DSL will generally lead and consider the following actions:

- Applying the Early Help assessment
- Submitting a referral form (BCP Family Support Referral Form)
- 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.

The Early Help assessment is designed as an assessment tool to facilitate early intervention and cooperation between agencies to improve outcomes for children/young people with additional needs.

An Early Help assessment might be used in the following circumstances:

- If there is concern about how the pupil is progressing in terms of their health, welfare behaviour, learning or any other aspect of their wellbeing.
- The school receive a request from the pupil or parent/carer for more support.
- The school is concerned about the pupil's appearance or behaviour, but their needs are unclear or are broader the school can address.
- The child has experienced multiple suspensions or is at risk of being permanently excluded
- The child has a parent or carer in custody or is affected by parental offending
- The child is frequently missing from education, home or care
- The Early Help assessment can be used to help identify the needs of the pupil and/or to pool knowledge and expertise with other agencies to support the child/young person better.

The DSL (or appropriate staff member) 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.

26.9 Managing Reports of Sexual Violence and/or Harassment

There are four likely scenarios to consider when managing any reports of sexual violence and/or harassment. It is important in all scenarios that decisions and actions are regularly reviewed and updated to reflect on lessons learned. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour.

All concerns and reports of sexual violence and/or sexual harassment should be reported to the DSL, who will make appropriate decisions and take action.

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

If the victim asks the school not to report or tell anyone about the sexual violence or sexual harassment there will be a need to balance the victim's wishes against the duty to protect the victim and other children. If a referral is made to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

The four scenarios are:

1. Manage Internally

- In some cases of sexual harassment, e.g. one-off incidents the safeguarding team may take the view that the children concerned are not in need of early help or referrals to statutory services and that it would be appropriate to handle the incident internally, through the behaviour policy and providing pastoral support.
- The principle that there is a zero tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

2. Early help

- In line with above, the safeguarding team may decide that the children do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges. It can be particularly useful to address non-violent Harmful Sexual Behaviours (HSB) and may prevent escalation of sexual violence.
- Early help and the option to manage a report internally do not need to be mutually exclusive; a school could manage internally and seek early help for both the victim and perpetrator(s)
- The principle that there is a zero-tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

3. Referrals to Bromley Social Care

- Where a child has been harmed, is at risk of harm or is in immediate danger, a referral should be made to Bromley Social Care.
- At the point of referral, the school will generally inform parents/carers of those involved, unless there are compelling reasons not to (if, for example, it will put the child at additional risk). Any such decision should be made in conjunction with Bromley Social Care.
- Where statutory assessments are appropriate, the DSL or deputies should be working alongside, and cooperating with, the allocated social worker.
- The school will not wait for the outcome of the investigation before protecting the victim and other children within school. The risk assessment will help inform any decisions. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the report and all other children at the school should be immediate.
- If the social care assessment concludes that statutory intervention is not appropriate, the school should be prepared to refer again if they believe that the child remains in immediate danger or at risk of harm.
- The principle that there is a zero-tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

4. Reporting to the police

- Any report to the police will generally be in parallel with a referral to Bromley Social Care.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police.
- Where a report has been made to the police, the school should consult with the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents/carers and the best way to protect the victim and their anonymity.
- At the point of referral, the school will generally inform parents/carers of those involved, unless there are compelling reasons not to (if, for example, it will put the child at additional risk. Where the parent/carer has not been informed it is especially important that the school supports the child in any decision that they make. This should be with the support of children's social care and any appropriate specialist agencies.
- Should it become clear that the police (for whatever reason) will not take further action, the school will continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- The principle that there is a zero-tolerance approach to sexual violence and harassment and that it is never acceptable and will not be tolerated remains and underpins any action taken.
- All concerns, discussions, decisions and reasons for decisions should be recorded.

Unsubstantiated, unfounded, false or malicious reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL (or deputies) should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help and take action accordingly.
If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy.

Ongoing Response

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. Wherever possible, the victim, if they wish, should be able to continue in their normal routine.
We are aware that sexual assault can result in a range of health needs, including physical, mental and sexual health problems and unwanted pregnancy. Support should be given to the young people in signposting them towards relevant external agency support including the Child Sexual abuse Care pathway.
When it is clear that ongoing support will be required, school should ask the victim if they would find it helpful to have a designated trusted adult. The choice of any such adult should be the victim's (as far as reasonably possible).

Ongoing Considerations: Risk assessment

When there has been a report of sexual violence, the DSL will complete an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult pupils and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms
- The time and location of the incident, and any action required to make the location safer.

Risk assessments will be recorded, shared with the children/young people and their parents/carers and kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and put adequate measures in place to protect them and keep them safe.

Victim and alleged perpetrator(s) sharing classes

This will inevitably involve complex and difficult decisions, including considering their duty to safeguarding children and their duty to educate them. It is important that each report is considered on a case-by-case basis and risk assessments are updated as appropriate. The best interests of the child should come first.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes that they share with the victim, where this is possible. Alternatively, it may be decided, in consultation with the victim, that they would want to swap or change classes however this decision must always be reached in agreement with the victim. The school also needs to consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school should take suitable action, if they have not already done so. In all but the most exceptional of cases, the rape or assault is likely to constitute a serious breach of the behaviour policy and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and considering the most appropriate way to manage potential contact on both school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed.

The decisions reached and rationale will be recorded.

Reports of sexual assault and harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means that the offence did not happen, or the victim lied. The process will have affected both the victim and the alleged perpetrator(s). Appropriate support should be given to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. The school should record and be able to justify their decision making.

Safeguarding and supporting the alleged perpetrator(s) and young people who have displayed harmful sexual behaviour

There is a difficult balancing act to consider. On one hand, there is a need to safeguard the victim (and wider pupil body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

We recognise the importance of understanding intra-familial harms and will consider any necessary support for siblings following incidents.

There is a need to consider 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 as well as potentially posing a risk of harm to other children.

It is important that the perpetrator(s) is/are also given the correct support to try and stop them re-offending 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.

27. Supporting Pupils

The DSL (or the responsible delegate) will:

- Meet regularly with a pupil that is subjected or at risk of a child protection plan.
- Notify Children's Social Care as soon as there is significant concern.
- Encourage self-esteem and self-assertiveness.
- Promote a caring, safe and positive environment within the school.
- Liaise and work together with all other support services and those agencies involved in the safeguarding of children.
- Provide a variety of interventions for support both within school and via outside agencies. This may include counselling, pupil advising, mentoring, behaviour or anger management.
- Investigate and refer to the relevant agency, any of the following attendance issues: regular, repeated absence; Absence at the end of a holiday period; Persistent lateness.
- Manage all information in line with Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018).
- Have due regard to the relevant data protection principles, which allows for personal information to be shared (and withheld) for the purposes of keeping children safe (Data Protection Act 2018 and GDPR; KCSIE paras 101-103)
- Recognise that all matters relating to Child Protection are confidential.
- Reassure pupils that their concerns are being taken seriously and that they will be supported and kept safe in order they do not feel like they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- work in accordance with Operation Encompass arrangements and ensure information received from police regarding domestic abuse incidents is used to provide appropriate support and safeguarding for pupils.

27.1 Pupils with special educational needs, disabilities, or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions have additional needs and may be more vulnerable to safeguarding issues. It is accepted that their vulnerabilities may be missed owing to their SEN and therefore may need to receive more pastoral support to ensure these barriers are overcome.

Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges Our schools provide extra pastoral support for pupils with SEN and disabilities.
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the

Some children may be more vulnerable to safeguarding issues as a result of their special educational need. These may include children with SEMH:

In accordance with each school's Special Educational Needs Policy pupils who may have SEMH concerns are identified and placed on the SEN register. Pupils might be identified by staff, parents, the pupils themselves or at

transition. There are many reasons a pupil may experience SEMH issues ranging from bereavement to co-morbidity with other special educational needs including:

- ADHD Attention Deficit Hyperactive Disorder
- ADD Attention Deficit Disorder
- ODD Oppositional Defiant Disorder
- Attachment Disorders
- Diagnosed Depression
- Diagnosed Anxiety
- Eating Disorders
- Low mood, depression and suicidal thoughts

Social, emotional and mental health concerns may sometimes be triggered by other safeguarding issues such as: domestic violence, abuse, sexualised behaviour and other childhood traumas.

For further support on pupils with SEND schools can use the Special Educational Needs and Disabilities Information and Support Services (SENDIASS).

For more information, please refer to the SEND Policy for each school.

27.2 Pupils with medical conditions

A child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in a school, the responsible healthcare professional, in conjunction with the DSL should consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.

27.3 Pupils with a social worker

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

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

27.4 Looked-after and previously looked-after children

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:

- 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
- The DSL has details of children's social workers and relevant virtual school heads

Each school will have a designated teacher 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.

As part of their role, the designated teacher will:

- 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
- 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

27.5 Pupils who are lesbian, gay, or bisexual

A pupil being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

27.6 Pupils who are questioning their gender and requests relating to social transition

The Trust recognises that some pupils may question their gender and may seek support from school staff. All pupils will be treated with dignity, respect and compassion, and any form of bullying, harassment or discrimination will not be tolerated.

The Trust acknowledges that it is common for children and young people to explore identity, interests, appearance and behaviours that may not align with gender stereotypes. Staff should avoid making assumptions and should respond sensitively and professionally to any child expressing uncertainty or distress relating to their gender identity.

When responding to any request relating to social transition, schools within the Trust will:

- act in accordance with safeguarding duties and the best interests of the child;
- comply with obligations under the Equality Act 2010, Human Rights Act 1998 and relevant safeguarding legislation; take a cautious and evidence-informed approach;
- involve parents/carers as a priority except where doing so may place the child at risk of harm;
- maintain accurate safeguarding and pupil records, including biological sex where legally required;
- ensure that decisions are individually considered, proportionate, documented and reviewed where necessary.

<u>Requests Relating to Social Transition</u>

The Trust will not initiate action in relation to social transition. This section applies only where a child or parent/carer has made a request for support.

Social transition may include requests relating to names, pronouns, uniform, participation in activities or other aspects of school life. Any request will be carefully considered on a case-by-case basis.

No member of staff may make informal or unilateral arrangements relating to social transition without agreement through the school's decision-making process.

Schools must consider what is in the best interests of the pupil and other children affected. A pupil's wishes will be listened to carefully, but they may not determine the outcome.

Staff should remain professionally curious and consider whether there are any wider factors impacting the pupil, including:

- mental health needs;
- neurodiversity;
- experiences of bullying or discrimination;
- family or peer relationships;
- broader social or emotional vulnerabilities.

The Designated Safeguarding Lead (DSL) must be involved in all cases where requests relating to social transition are being considered.

The Trust recognises the particular safeguarding considerations relating to primary-aged children and will take an especially cautious approach in such cases.

Involvement of Parents and Carers

Parents and carers play a central role in a child's wellbeing and development. In most cases, schools will work in partnership with parents/carers when considering requests relating to social transition. Where appropriate, support may be offered to facilitate discussions between the pupil and their parents/carers.

If there is reason to believe that informing parents/carers may place the pupil at risk of significant harm, the DSL will determine the appropriate safeguarding response before any contact is made, this will include seeking external advice. The DSL will ensure a record of decision making is made on CPOMS/MyConcern.

Where a pupil speaks to a member of staff about their feelings but does not request changes to their treatment in school, confidentiality will usually be respected unless there are safeguarding concerns.

The Trust has a zero-tolerance approach to bullying, including discriminatory bullying. Any bullying, harassment or victimisation relating to gender identity or gender questioning will be addressed promptly in line with the Behaviour Policy. At the same time, the Trust recognises the rights of all pupils and staff, including rights relating to religion or belief, freedom of expression and privacy, and will seek to manage sensitive situations respectfully and lawfully.

Single-Sex Spaces and Activities (see sections 16 and 17)

In line with safeguarding obligations and relevant regulations, pupils will not be permitted to access toilets, changing rooms, boarding or residential accommodation designated for the opposite biological sex. Where sports or PE activities are designated by sex for reasons of safety or fairness, pupils will not participate in activities designated for the opposite biological sex. Schools and colleges will consider reasonable arrangements to support the dignity, privacy and wellbeing of all children.

Record Keeping and Information Sharing

Accurate information is essential for safeguarding purposes. Schools are legally required to record a pupil's biological sex accurately where recorded. Relevant staff must be made aware of information necessary to safeguard and support the pupil appropriately. All discussions, decisions, risk assessments and agreed actions relating to requests for social transition will be securely recorded and reviewed as appropriate.

Reviews and Changes in Circumstances

Requests and agreed support arrangements will be kept under review. Circumstances, safeguarding risks or the needs of the pupil may change over time, requiring earlier decisions to be reconsidered. The DSL will be involved in any review process.

Support for Detransition

The Trust recognises that some pupils may later wish to reverse or change previous decisions relating to social transition. Schools and colleges will support pupils sensitively and work with parents/carers and relevant professionals to ensure appropriate support is provided.

27.7 Pupils in Alternative Provision

We recognise that pupils placed in Alternative Provision (AP) are among the most vulnerable in our school community and may face increased safeguarding risks. In line with the DfE's statutory guidance on Alternative provision - GOV.UK our schools remain responsible for the safeguarding and welfare of any pupil placed in AP, including those attending pupil referral units (PRUs), independent providers, or in-school units.

Before commissioning any AP, we ensure that:

- The provision is safe, appropriate, and meets the pupil's individual needs.
- A written agreement is in place outlining safeguarding responsibilities.
- Written information has been received showing that appropriate safeguarding checks have been carried out on individuals working at the alternative provision (i.e. those checks that our schools would perform on our staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can assure itself that appropriate safeguarding checks have been carried out on new staff. A personalised plan is developed for the pupil, including clear objectives, timeframes, and monitoring arrangements (this can also be detailed on a Pastoral support plan (PSP) or SEND Provision Map).
- Regular reviews (at least half termly) are conducted to assess attendance, progress and wellbeing.

We are committed to ensuring that all pupils in AP continue to receive high-quality education and support, and that safeguarding remains a priority throughout their placement.

27.8 Pupils who are Young Carers

We are alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. 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 services.

28. Notifying parents or carers

Where appropriate, schools 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.

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

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

In the case of allegations of abuse made against other children, the school will normally notify the parents or carers of all the children involved.

29. Supporting Staff

We recognise that staff working in the schools who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL or DDSL and to seek further support as appropriate. Our DSLs and DDSLs also have access to regular supervision, via a trust contract paid for by each school.

30. Safer recruitment policy

The Trust carries out specified recruitment and vetting checks on intended new appointees, particularly

- identity and teaching and other qualification checks, and for relevant staff and other adults working in schools, Disclosure and Barring Service (DBS) checks, prohibition checks and right to work in England checks.
- Risk assessments will be approved by a senior leader within each school.
- Online searches are carried out as part of due diligence on shortlisted candidates. These ensure that nothing in the public domain is a cause for concern in respect of the candidate's motivations to work with children and young people and them upholding the standards and ethos of the trust. Incidents or issues, which may have happened will be explored with the applicant at interview. Shortlisted candidates will be informed that an online search is part of due diligence checks in the recruitment process.
- The board of trustees is responsible for ensuring that safer recruitment checks are carried out in line with statutory requirements, currently set out in the Department for Education's Safeguarding Children and Safer Recruitment in Education guidance document.
  The Trust obtains written assurances that appropriate child protection checks, and procedures apply to any staff employed by another organisation who work with the schools' pupils at any time.
  Every school interviewing panel will always include someone who has both attended Safer Recruitment training and been awarded a certificate of proficiency at it. This person will ensure safeguarding is covered during the interview.
  The Trust does not employ an individual who has been barred from working with children.
- In accordance with the Trust's 'Procedure for dealing with allegations of abuse against adults working with pupils', the Trust refers to the Panel for Professional Conduct of the Teaching Regulation Agency and the Disclosure and Barring Service, details of anyone who is permanently removed from working or

volunteering in school (or who leaves while under investigation) for allegedly causing harm or posing a risk of harm.

- Each school maintains records of the recruitment checks in a single central record (SCR). The schools' SCRs show the nature of the checks made, the date on which they were made and the identity of those making the checks or entering the details in the record.
- Section 128 checks are also carried out on all SLT members, Trustees, Members and Governors working in each school.

31. Neutral Notifications

It is accepted that there are occasions when school staff, as professionals, have to act in a particular way in order to protect the health, safety and welfare of their pupils. Such situations could put the adult in a potentially vulnerable position and perhaps cause them, with hindsight, to consider that they might have chosen to act in a different manner.

There may be occasions when an incident occurs which is out of the ordinary and which causes a member of staff to have doubts about the behaviour of an adult towards a pupil or another child [Such doubts which fall below the threshold for a Safeguarding Concern Report and so may be referred to as low-level concerns].

The reporting of low-level concerns enables our schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the schools are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

There may also be occasions when a member of staff has concerns about how their own behaviour in a specific situation might be misinterpreted. It is important that any occasions or incidents which might give rise to such concerns are reported to the DSL. In the vast majority of cases, there will be a perfectly innocent and reasonable explanation for what has occurred.

The procedure for self-reporting or reporting a concern of this nature is called 'Neutral Notification'. (Appendix 4) The purpose of neutral notification is to protect both pupils and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

Where a member of staff is the subject of a notification [self-notification or by a colleague] they will suffer no detriment or stigma. Notifications of these types are a neutral act, and the DSL will, on receipt of a notification, determine how to best approach the issue.

Neutral Notifications can be made in person in the first instance. The Neutral Notification Form should be passed to the DSL. If the notification is made in person in the first instance, staff may be required to complete a Neutral Notification Form later.

The DSL will receive all Neutral Notifications. Such records will be kept confidentially and shared with the relevant safeguarding team and relevant agencies only in cases where it leads to a Safeguarding Report being generated and such liaison / reporting is required.

A staff member who makes a Neutral Notification in good faith will suffer no detriment as a result but failure to make a Neutral Notification could, however, constitute misconduct and lead to the implementation of the School's Disciplinary Procedure.

The circumstances in which staff should make a Neutral Notification are as follows:

- any incident where s/he feels that his/her actions or behaviour towards a pupil could be misinterpreted;
- any incident which a member of staff is aware of actions of a colleague towards a pupil which could be misinterpreted;
- any incident of which a staff member is aware where the interactions of a colleague with a pupil are not appropriate to the pupil's age or need at that time;
- inadvertent email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols;

- any unsupervised contact with a pupil other than in the context of a one-to-one lesson or discussion about academic, extracurricular or pastoral issues or other situations which fall within expected boundaries of professional conduct;
- any incident where a member of staff has been alone with a pupil or pupils in a vehicle where this has not been authorised in advance;
- any inadvertent **and** potentially inappropriate social contact with pupils outside of school (such as restaurants or pubs);
- if a pupil uses a staff member's home address, mobile or home phone number, or private e-mail address;
- one-to-one contact with a pupil on a school trip [residential / non-residential] which falls outside expected boundaries of professional conduct;

This is not intended to be an exhaustive list but is representative of the circumstances where a Neutral Notification is expected to be made. Anything which causes staff to have a 'nagging doubt' about the way in which other adults behave or interact with pupils (or their own actions could be viewed) should be notified, in order to protect both pupils and the members of staff involved.

NB. Where there is evidence that a professional boundary has been broken and the threshold for a Safeguarding Concern Report has been met, Neutral Notification must be bypassed, and the usual Safeguarding Concern reporting lines must be followed.

32. Whistleblowing (see separate Whistleblowing Policy)

Staff must acknowledge their individual responsibility to bring matters of concern to the attention of SLT or the Headteacher, or to the CEO if the concern is about the Headteacher They should voice any concerns that they might have to their line manager or any member of the SLT. Once staff have shared their concerns, they should submit them in writing giving names, date and places where appropriate. No action will be taken against staff members if the concern proves to be unfounded but was raised in good faith. However, allegations that are made frivolously, maliciously or for personal gain will be seen differently and disciplinary action may be taken. This includes concerns raised and not acted upon by the safeguarding leads. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

33. Allegations management

For details regarding the management of allegations of abuse against staff see Appendix 2.

34. Complaints management

Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our approach to dealing with allegations against staff, which is set out in Appendix 3 of this policy.

Other complaints

Any other complaints will be dealt with in accordance with the Trust's complaints policy.

Whistleblowing

Anyone (staff members, pupils, parents, carers, other) can raise a Safeguarding concern through the Trust's Whistleblowing or Complaints policies.

35. Record-keeping

We will hold records in line with our Management and Retention of Records Policy.
All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

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

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.
Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.
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 and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or ServicesChildren's Social Care 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.

In addition:

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

Local record-keeping arrangements

- Digital sensitive information: Each school and the Trust's Central Team will ensure that sensitive digital information is held only on the Trust's secure IT systems, and never on personal data storage devices or laptops or shared using non-Trust email accounts. Only those staff members who require access and have the requisite DBS clearance should have access to this information.
- Sensitive information held on paper: Each school and the Trust's Central team will ensure that hard copy sensitive information is stored in locked filing cabinets and preferably inside a locked room. Only those people who require access and have the requisite DBS clearance should have access to this information.

APPENDIX 1: What to do when a child discloses?

- Stay calm and reassuring – do not show that you are shocked or upset
- If necessary arrange a time and place to talk privately
- Listen to and believe them
- Allow them time to talk freely and do not ask any leading questions
- Tell the child that they have done the right thing in telling you
- Explain that you cannot promise to keep secrets
- Don't make any other promises to the child
- Explain what will happen next and that you will need to pass the information onto the DSL
- Listen and reassure
- Be supportive
- Inform the Designated Lead, or in their absence, the Deputy Designated Lead
- 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
- Report the concern using the school's system (record the date and time)

If a child is at immediate risk of harm, they should be kept safe, and the concern should be reported immediately to the DSL or Deputy DSL.

DO NOT

- Show that you are shocked or upset
- Tell them they should have told you sooner
- Make any other promises to the child (other than that you will pass the information on to the DSL)
- Press for details
- Pre-judge what you are told or make assumptions
- Inform or speak with parents
- Try to manage the situation without the DSL
- Discuss the matter with line manager or other colleague
- Agree to keep the matter secret
- Offer a mobile or other telephone number to pupil for support

APPENDIX 2: Allegations of abuse made against staff

All allegations against a member of staff should be taken seriously and reported to the Headteacher straight away. Do not investigate, as this is confidential information and should not be discussed with anyone, including the member of staff who has had the allegation made against them.

All references in this policy refer to members of staff or volunteers (including supply staff and trainee teachers) who workin the school or trust. The policy refers to a staff member's behaviours inside school and also their behaviour with
regard to their own child/children/foster children or adopted children. The school has the right to know whether a staff member has been investigated by the police or social care in order to assess whether there may be implications for children with whom the person is currently working.

a) The Headteacher on all such occasions will discuss the content of the allegation with the LADO (Local Authority Designated Officer for Managing Allegations Against Adults Working with Children) and will inform the CEO.
b) If the allegation made to a member of staff concerns the Headteacher, that member of staff will immediately inform the CEO who will consult with the LADO.
c) The school will manage allegations against staff and other adults working with children in accordance with the trust's agreed procedures for Managing Allegations of Abuse Against Adults Working with Pupils, Part 4 KCSiE and as set out in the Bromley Safeguarding Children Partnership LADO procedures.
d) If a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, this will be referred to the Disclosure and Barring Service.

It is essential that any allegation of abuse made against a teacher or other member of staff in school or the trust (including volunteers, individuals using the school premises for running an activity and/or supply staff) is dealt with fairly, quickly and consistently in a way which provides both effective protection for the pupil whilst supporting the person who is the subject of the allegation. All allegations should be followed up and the following procedures adhered to. The trust will follow the Bromley Safeguarding Children Partnership's Allegation protocol. The trust recognises that volunteers who are currently working in a school are counted as a staff member should an allegation be made.

A 'case manager' will lead any investigation as follows:

Staff Group who the concern is against	Case Manager	Seek advice and guidance from the Trust's Head of Human Resources
School based staff, volunteers, or contractors	Head Teacher	
Head Teacher	Chief Executive Officer	
Central Team Staff	Chief Executive Officer	
Chief Executive Officer	Chair of Trustees	

If the concern is regarding a Governor or Trustee, please contact the Trust's Head of HR for advice.
Our procedures for dealing with allegations will be applied with common sense and judgement.

In the event of an allegation being made, the case should be referred to the Headteacher **immediately** or in the event that the Headteacher is the subject of the allegation then it should be taken to the CEO who will work with the Local Authority Designated Officer. In the event of the Headteacher's absence, allegations should be taken to the next most senior member of staff on site.

An allegation made in respect of any of the following should be reported to Local Authority Designated Officer on the same day:

- An allegation that a member of staff has behaved in a way that has harmed a pupil or may have harmed a pupil.

- An allegation that a member of staff may have committed a criminal offence against or relating to the pupil.
- An allegation that a member of staff has behaved towards a pupil or pupils that indicates she/he is unsuitable to work with children.
- An allegation that a member of staff is having a sexual relationship with a pupil. Employees of the school are in positions of trust in respect of the pupils, even if consensual (see ss16-19 Sexual Offences Act 2003).

This is outlined in our Staff Code of Conduct, with the following:

- It is a criminal offence for any person employed in a position of trust, including all teachers, to have a sexual relationship with any person who is a pupil at the school at which they are employed, even if that person is over 16 years of age.
- Staff should maintain professional boundaries with pupils appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably.

- An allegation that a member of staff is 'Grooming' i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003).
- An allegation that a member of staff is carrying out other 'grooming' behaviour giving rise to concerns towards any pupils of a broader child protection nature e.g. inappropriate text /e-mail messages or images, gifts, socialising etc.
- An allegation that a member of staff may be in possession of indecent photographs / pseudo-photographs of children.
- Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.
- An allegation that they have behaved or may have behaved in a way that indicates that they may or may not be suitable for work with children.

The parents or carers of the pupil involved should be informed as soon as possible. They should be kept informed of the investigation made by the school and told the outcome if there is not a criminal prosecution. This should include the outcome of any disciplinary process.

The Headteacher should inform the accused member of staff as soon as possible after first discussing the matter with the LADO.

If the allegation is suspected to involve gross misconduct or it is in the interests of the school, a pupil, an employee or the member of staff, the Headteacher may immediately suspend the member of staff from work on full pay and benefits whilst the investigation proceeds, following discussion with the Head of HR. The Headteacher must immediately inform the CEO and Chair of Governors when imposing a suspension. Suspension is not a disciplinary action and will be reviewed to ensure that it is not unnecessarily protracted, (Refer to staff disciplinary procedures).

In all cases where suspension is being considered, the Headteacher or CEO should advise the individual to seek assistance from his or her trade union.

Whilst suspended the member of staff should be informed of the progress of the case and wherever possible a timescale for action should be agreed.

Where suspension following allegations of abuse is being considered, an interview should be arranged. Normally, the interview should be undertaken outside pupil contact time. The Headteacher (or, in cases where the allegation is against the Headteacher, the CEO should consult with and seek advice from the Local Authority Designated Officer.

If a member of staff resigns or ceases to provide their services to the school(s) every effort should be made to reach a conclusion regarding the allegation.

If the Trust ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring

Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.

Where a teacher has been dismissed, or would have been dismissed had they not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency should be made.

Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headteacher will consider whether to take disciplinary action in accordance with the School's Behaviour Management Policy.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

For further information, please refer to the Allegations against Staff Policy.

Confidentiality

It is important that in accordance with Keeping Children Safe in Education (September 2026); the schools make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

APPENDIX 3: Example External Speakers Proforma

Name of External Speaker:	
Organisation (if applicable):	
Purpose of Visit:	
What communication have you had with the speaker/organisation prior to the visit and how was the content of any presentations decided	
In your communication and research with the speaker and/or organisation have you found anything which might lead you to believe that the speaker might not be suitable to speak to pupils at the school	
Date of arrival:	
Year group being presented to:	
Barred List check completed?	**YES/NO**
Research of external speaker/ organisation – any causes for concern? (please attach research material)	**YES/NO**
Additional comments	
Staff name:	
Date:	
Designated Safeguarding Lead (DSL):	
Date:	

Head Teacher/DSL

Approval:	**Approved/Not approved**
Date:	

APPENDIX 4 Example Neutral Notifications Form

Schools may have online systems for the reporting of neutral notifications.
In other circumstances, this form should be completed.

Adult Neutral Notification or Self-report **Confidential**

School name	
Name of adult making the report and signature	**Role in school**
Person referred to and their role	**Date**

- See Safeguarding Policy for detail about neutral notifications and self-reporting
- Use this form to record any concerns
- The form should be handed directly to the DSL or Headteacher as soon as possible
- Be as precise and accurate as possible.
- Continue on a separate A4 sheet if necessary. Each page should be numbered (page x of x), dated and signed.

Nature of notification or self-report

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Action taken

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APPENDIX 5: Glossary of Key Safeguarding Terms and Acronyms

Term	Definition / Context
AI	Artificial Intelligence – referenced in the context of online safety and safeguarding risks.
CCE	Child Criminal Exploitation – when a child is manipulated or coerced into criminal activity, often through gangs or County Lines.
CEO	Chief Executive Officer – the senior executive of the Multi Academy Trust.
CME	Children Missing Education – children not registered at a school or receiving suitable education.
CPOMS / MyConcern	Secure online systems used for recording and managing safeguarding concerns.
CSE	Child Sexual Exploitation – a form of sexual abuse where children are manipulated or coerced into sexual activity.
County Lines	Criminal networks that exploit children to transport drugs across regions.
DBS	Disclosure and Barring Service – conducts criminal record checks for those working with children.
DDSL	Deputy Designated Safeguarding Lead – supports the DSL and acts in their absence.
DSL	Designated Safeguarding Lead – the senior staff member responsible for safeguarding and child protection in a school.
EHCP	Education, Health and Care Plan – a legal document outlining the support a child with SEND needs.
EHE	Elective Home Education – when parents choose to educate their child at home rather than at school.
Early Help	Support provided to children and families at the earliest stage of need.
Extremism	Vocal or active opposition to fundamental British values.
FGM	Female Genital Mutilation – illegal and harmful practice involving partial or total removal of female genitalia for non-medical reasons.
GDPR	General Data Protection Regulation – governs how personal data is collected, stored, and shared.
KCSIE	Keeping Children Safe in Education – statutory guidance from the Department for Education on safeguarding in schools.
LA	Local Authority – the local government body responsible for education and safeguarding.
LADO	Local Authority Designated Officer – manages allegations against adults working with children.

LGBT	Lesbian, Gay, Bisexual, and Transgender – refers to sexual orientation and gender identity.
Modern slavery	encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour.
Neutral Notification	A system for staff to report low-level concerns or incidents that may be misinterpreted.
Operation Encompass	A police and education initiative to support children exposed to domestic abuse.
PMAP	Prevent Multi-Agency Panel – supports individuals at risk of radicalisation.
Child-on-child abuse	Abuse between children, including bullying, sexual violence, and harassment.
Prevent	Government strategy to stop people becoming terrorists or supporting terrorism.
Radicalisation	The process by which a person comes to support terrorism and extremist ideologies.
SCR	Single Central Record – a record of all staff and their safeguarding checks.
SEND	Special Educational Needs and Disabilities – children with learning difficulties or disabilities that require special educational provision.
SLT	Senior Leadership Team – the group of senior staff responsible for school leadership and management.
Sexual harassment	Unwanted conduct of a sexual nature that violates a child's dignity.
Sexual violence	Includes rape, assault by penetration, and sexual assault.
TRA	Teaching Regulation Agency – responsible for teacher misconduct investigations.
VAWG	Violence Against Women and Girls – includes domestic abuse, sexual violence, and other gender-based violence.