FOUNDATION FOR GROWTH
WOOTTON PARK ACADEMY TRUST
'Ipsum quod faciendum est diutius'

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1. Our strong safeguarding culture

1.1 Why it is important

1.1.1 Safeguarding is everyone's responsibility, and it is the duty of the Trustees and the Parent, Carer, Community Advisory Board (PCCAB) to safeguard and promote the welfare of children. 'Children' includes everyone under the age of 18. This is our core safeguarding principle.

1.1.2 In adhering to this principle, we focus on providing a safe and welcoming environment for our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. Our children have equal rights to support and protection.

1.1.3 One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, Trustees and PCCAB, all of whom are trained upon its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law, guidance and best practice.

1.1.4 This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

1.2 What it means for our learners

1.2.1 We work with our local safeguarding partners to promote the welfare of children and to protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans, which provide additional support to the child. It also includes contributing to broader, multi-agency strategic discussions about safeguarding children.

1.2.2 Our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any learners or staff involved in child protection or safeguarding issues will receive appropriate support.

1.2.3 Our strong safeguarding culture ensures that we treat all learners with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among learners, and we set a good example by conducting ourselves appropriately.

1.2.4 Identifying safeguarding and child protection concerns often begins with recognising changes in learners' attendance and/or behaviour and knowing that these changes may be signs of abuse, neglect, or exploitation. Challenging behaviour may also be an indicator of abuse.

1.2.5 Our staff will reassure children that their concerns and disclosures will be taken seriously, and that they will be supported and kept safe.

2 Safeguarding legislation and guidance

2.1 The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- What to do if you're worried a child is being abused (2015)
- Prevent duty guidance: Guidance for specified authorities in England and Wales (2023)
- The Teacher Standards 2012
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2021
- PACE Code C 2019
- Crime and Policing Act 2026
- Statutory Framework for the Early Years Foundation Stage (EYFS)

3 Roles and responsibilities

The designated safeguarding lead (DSL) at Wootton Park School (WPS) is:

Contact details: email: j.page@woottonparkschool.org.uk

The designated safeguarding lead (DSL) at Overstone Gate Primary School (OGPS) is:

Contact details: email: k.smith@overstonegateprimaryschool.org.uk

The deputy DSL(s) is at WPS is:

Contact details: email: S.macdonnell@wootonparkschool.org.uk

The deputy DSL(s) is at OGPS is:

Contact details: email: c.picton@overstonegateprimaryschool.org.uk

The safeguarding Trustee is:

Contact details: Martin Scoble: clerkgb@woottonparkschool.org.uk

The Executive Head/CEO is:

Contact details: email: ceo@woottonparkacademytrust.org.uk

3.1 **The designated safeguarding lead (DSL):**

3.1.1 The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety) in the Trust. The DSL duties include:

- Ensuring child protection policies are known, understood, and used appropriately by staff.
- Working with the board of Trustees and PCCAB to ensure that the Trust's child protection policies are reviewed annually and that the procedures are reviewed regularly.
- Acting as a source of support, advice, and expertise for all staff on child protection and safeguarding matters.
- Liaising with the police regarding ongoing enquiries under Section 47 of the Children Act 1989 and police investigations, and be aware of the requirement for children to have an appropriate adult in relevant circumstances.
- Acting as a point of contact with the three safeguarding partners.
- Making and managing referrals to children's social care, the police, or other agencies.
- Keeping detailed, accurate, secure written records of concerns, discussions, and decisions made, including the rationale for those decisions (including where referrals were or were not made).
- Taking part in strategy discussions and inter-agency meetings.
- Liaising with the 'case manager' and the designated officer(s) at the local authority if allegations are made against staff.
- Making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements.
- Transferring the child protection file to a child's new school.
- Work with the Headteacher / Head of School to ensure that the relevant staffing ratios are met, where applicable.
- Work with the Headteacher / Head of School to ensure that each EYFS child is assigned a key person.

3.2 **The deputy designated safeguarding lead(s):**

3.2.1 Our deputy DSL(s) are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

3.3 **The safeguarding governor/trustee**

3.3.1 The role of the safeguarding trustee is to provide support and challenge to the DSL and the leadership of the trust on how they manage safeguarding, so that the safety and wellbeing of the children can continuously improve. The role includes:

- Understanding the requirements of the Governance Handbook and Keeping Children Safe in Education 2025.
- Supporting and challenging the DSL on the standards of safeguarding at the school/trust
- Confirming that consistent and compliant safeguarding practice takes place across the school/trust
- Reporting to the board of Trustees and PCCAB about the standard of safeguarding in the trust.

3.3.2 The DSL and the safeguarding Trustee meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the Trust.

4 Children who may be particularly vulnerable

4.1 Some children are at greater risk of abuse, neglect, and exploitation. This increased risk can be caused by many factors including social exclusion, isolation, discrimination, and prejudice. To ensure that learners receive equal protection, we give special consideration to children who:

- Are vulnerable because of their race, ethnicity, religion, special educational needs, disability, gender identity or sexuality.
- Are young carers.
- Are pregnant or are parents themselves.
- Are involved in the court system or have a family member in prison.
- Are vulnerable to being bullied, or engaging in bullying.
- Are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism.
- Live in chaotic or unsupportive home situations.
- Live transient lifestyles or live away from home or in temporary accommodation.

- Are affected by parental substance abuse, domestic abuse or parental mental health needs.
- Do not have English as a first language.
- Experience or have experienced bereavement or mental health difficulties.
- Are in care or privately fostered or have returned home to their family from care.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded.

5 Children with special educational needs, disabilities or health issues

5.1 Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect, and exploitation in this group of children, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Being more prone to peer group isolation that other children.
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.
- 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 content/behaviours in school or the consequences of doing so.

5.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

6 Children who are absent from education

6.1 Children being absent from education for prolonged periods, on an increasing basis and/or on repeat occasions, and children with unexplainable and/or persistent absences from education, can be an indicator of abuse, neglect, and exploitation, including sexual abuse or exploitation trafficking, modern slavery, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

6.2 We closely monitor attendance, absence, and exclusions and our DSL will take appropriate and proactive action, including notifying the local authority, particularly where children go missing

on repeated occasions, on an increasing basis, and/or are missing for periods during the school day.

7 Alternative provision

7.1 Where a learner is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that learner and will ensure we are satisfied that the placement meets the learner's needs.

8 Mental health

8.1 Schools have an important role to play in supporting the mental health and wellbeing of their learners.

8.2 All staff are aware that mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect, or exploitation and that in some cases they can develop into safeguarding concerns. Staff are also aware that where children have suffered adverse childhood experiences, those experiences can impact on their mental health, behaviour, and education.

8.3 All staff are aware that there are potential warning signs when a child is struggling with their mental health. These include:

8.3.1 Significant changes in behaviour.

8.3.2 Ongoing difficulty sleeping.

8.3.3 Withdrawing from social situations.

8.3.4 Not wanting to do things they usually like; and

8.3.5 Physical signs of self-harm or neglecting themselves.

8.4 Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy who will alert other relevant agencies as necessary.

9 Children who are lesbian, gay or bisexual

9.1 The fact that a child or a young person may be lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. Unfortunately, children who are lesbian, gay or bisexual or are simply perceived to be lesbian, gay or bisexual, can be vulnerable to discriminatory bullying by other children. The risk to these children can be compounded where children who lesbian, gay or bisexual lack a trusted adult with whom they can be open.

9.2 Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.

10 Children who are questioning their gender

10.1 The trust will take a sensitive, child-centred approach to learners who are questioning their gender identity or who have the protected characteristic of gender reassignment, having regard at all times to the welfare of the individual learner and the welfare of other learner.

10.2 The trust will respect both gender-critical and gender-affirming beliefs held within the school community and will not tolerate bullying, harassment, or discrimination in connection with any such beliefs.

10.3 The trust will not initiate any social transition actions. Where a child, parent, or carer requests support in relation to gender identity, including any form of social transition (such as changes to name, pronouns, or presentation), the trust will only implement any changes following a school-level decision made in accordance with the following process:

10.3.1 **DSL involvement**: The designated safeguarding lead will be informed and involved in the decision-making process from the outset, as gender-related requests may intersect with safeguarding considerations.

10.3.2 **Parental engagement**: Parents and carers will be engaged as a matter of priority and their views treated with importance. The trust will not implement any social transition arrangements without parental knowledge and engagement, save in the exceptional circumstances described in paragraph 10.3.3 below.

10.3.3 **Exception to parental engagement**: Where staff have reasonable grounds to conclude that involving parents or carers would create a greater risk of harm to the child, the DSL will determine what safeguarding action is appropriate before parents are contacted and before any decision is taken. Any decision to proceed without parental engagement will be documented with clear reasons.

10.3.4 **Professional advice**: Where appropriate, the trust will seek advice from relevant professionals, which may include the school's special educational needs coordinator (SENCO), relvant health professionals, or the local authority designated officer (LADO") where applicable. The trust will be alert to the possibility that gender-questioning presentations may co-occur with, or be influenced by, other factors including neuro-developmental conditions, mental health difficulties, or other needs.

10.3.5 **Cautious approach**: The trst will take a careful and considered approach, recognising that social transition is an active intervention with potentially significant consequences. In primary schools, support for full social transition will be agreed only in very rare circumstances.

10.3.6 **Record-keeping**: All discussions, decisions, and the reasons for those decisions will be recorded in writing and stored securely and confidentially. Records will be kept under review and revisited if circumstances change.

10.3.7 **Review**: Any agreed arrangements will be subject to periodic review. Where circumstances change, the DSL will be informed immediately and arrangements will be reassessed.

10.4 The trust will ensure that its facilities arrangements comply with its legal obligations in relation to biological sex and with its safeguarding duties.

10.4.1 **Toilets**: The trust will not permit a child to use toilet facilities designated for the opposite biological sex. Where a learner does not wish to use toilet facilities designated for their biological sex, the trust will consider whether an alternative arrangement, such as a self-contained individual toilet, can be provided without compromising single-sex provision or the safety, comfort, privacy, or dignity of the learner or other learners. Any such arrangement will be recorded and reviewed regularly.

10.4.2 **Changing rooms and showers**: The trust will not permit a learner aged 11 or over to undress in the presence of a learner of the opposite biological sex and will not permit access to changing rooms or shower facilities designated for the opposite biological sex as part of any social transition arrangements. Where a learner does not wish to use facilities designated for their biological sex, the trust will consider alternative arrangements that do not compromise single-sex provision, and will keep clear records, communicate appropriately, and review regularly.

10.4.3 **Overnight accommodation**: The trust will not permit a learner to share overnight accommodation with a learner of the opposite biological sex. Where a learner does not wish to share accommodation with a learner of the same biological sex, the trust will seek to identify alternative arrangements where possible without compromising safety, comfort, privacy, or dignity, and will document those arrangements.

10.5 For safeguarding purposes, relevant staff will be made aware of a learner's biological sex in all cases, and a learner's biological sex will be recorded accurately wherever it is recorded by the trust.

11 Child on Child abuse

11.1 Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is more likely that boys. The trust takes a zero-tolerance approach to sexual harassment and sexual violence; it is never acceptable and it will never be tolerated.

11.2 It is more likely that boys will be perpetrators of child-on-child abuse and girls' victims but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

11.3 All staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator and they are clear about the school's policy and procedures for addressing child-on-child abuse and maintaining an attitude of 'it could happen here'

11.4 Child-on-child abuse can take many forms, including:

- **Physical abuse** such as shaking, hitting, biting, kicking or hair pulling.
- **Bullying**, including cyberbullying, prejudice-based and discriminatory bullying.
- **Sexual violence** such as rape assault by penetration and sexual assault (This may include an online element which facilitates, threatens and/or encourages sexual violence).

- **Sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse and which may include misogyny/misandry.
- **Serious physical assault and harm** or the threat of harm with a weapon.
- **Causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- **Up skirting**, which involves taking a picture under a person's clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm.
- **Consensual and non-consensual making or sharing of nude and semi-nude images and/or videos** (including those generated by AI) and including pressuring others to share sexual content.
- **Abuse in intimate personal relationships between peers (also known as teenage relationship abuse**) - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse.
- **Initiation/hazing** – used to induct newcomers into a sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond.

11.5 Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing-type violence.

11.6 All staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

11.7 **Minimising risk**

11.7.1 We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries.
- Using assemblies to outline acceptable and unacceptable behaviour.
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs, and other suitable activities.
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable.

11.8 **Investigating allegations**

11.8.1 All allegations of child-on-child abuse should be passed to the DSL immediately, who will investigate and manage the allegation as follows:

- **Gather information -** children and staff will be spoken with immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the learner and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Recorded** – all concerns, discussions, and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential, and stored securely on the school's child protection and safeguarding systems, and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached, and the outcome.

11.8.2 Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2026. The DSL will decide on a case-by-case basis whether to carry out an immediate risk and needs assessment.

11.8.3 Reports of rape or assault by penetration are especially serious. While the trust establishes the facts and liaises with children's social care and the police, the alleged perpetrator(s) may be removed from any shared classes with the victim. The trust will also consider how to maintain a reasonable physical separation between the victim and alleged perpetrator(s) across school, including before or after school-based activities, and on transport to and from the school.

11.8.4 Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse:

11.8.5 Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

11.8.6 Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

11.8.7 The support required for the learner who has been harmed will depend on their particular circumstances and the nature of the abuse. The support we provide could include counselling and mentoring or restorative justice work.

11.8.8 Support may also be required for the learner who caused harm. We will seek to understand why the learner acted in this way and consider what support may be required to help the learner and/or change behaviours. The consequences for the harm caused or intended will be addressed.

12 Serious violence

12.1 Serious violence is a continuing safeguarding concern which may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and criminal exploitation. All staff are aware of the signs that a child may be at risk of or involved in serious violence, including:

12.1.1 An increased absence from school or college or a significant decline in educational performance.

12.1.2 A change in friendships or relationships with older individuals or groups.

12.1.3 Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and

12.2 Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

13 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

13.1 Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator, and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:

13.1.1 Age.

13.1.2 Gender.

13.1.3 Sexual identity.

13.1.4 Cognitive ability.

13.1.5 Physical strength.

13.1.6 Status.

13.1.7 Access to economic or other resources.

13.2 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can also be perpetrated by an organised network or gang and the victim may identify as being part of this group. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

13.3 CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.

13.4 **Child Criminal Exploitation (CCE)**

13.4.1 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

13.4.2 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

13.4.3 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

13.4.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys, and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

13.5 **CCE indicators**

13.5.1 **CCE** indicators can include children who:

(a) Appear with unexplained gifts or new possessions.

(b) Associate with other young people involved in exploitation.

(c) Suffer from changes in emotional well-being.

(d) Misuse drugs or alcohol.

(e) Go missing for periods of time or regularly return home late.

(f) Regularly or increasingly miss school or education or do not take part in education.

13.6 **Child Sexual Exploitation (CSE)**

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

13.6.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media.

13.6.3 CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

13.6.4 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

13.7 **CSE indicators**

13.7.1 The above indicators can also be indicators of **CSE**, as can children who:

(a) Have older boyfriends.

(b) Suffer sexually transmitted infections or become pregnant.

13.8 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

13.9 Victims of criminal and sexual exploitation can be boys or girls, and it can have an adverse impact on a child's physical and emotional health.

13.10 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

14 County lines

14.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure the compliance of victims.

14.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out at paragraph 10.1 of this policy.

14.3 Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 10.3 of this policy, with the main indicator being missing episodes from home and/or school.

14.4 Additional specific indicators that may be present where a child is criminally exploited include children who:

- Go missing and are subsequently found in areas away from home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Are found in accommodation with which they have no connection or in a hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

14.5 All staff are aware of indicators that children are at risk from or are experiencing criminal exploitation. The main indicator is increased absence, during which time the child may have been trafficked for the purpose of transporting drugs or money.

15 Sharing nudes and semi-nudes

15.1 Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop.

15.2 Images may be taken or created by the child themselves or by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

15.3 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

15.4 The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them, claiming to be from a peer.
- Children and young people digitally manipulate an image of a young person into an existing nude online.
- Images created or shared are used to abuse peers, e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

15.5 The trust takes a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation, or vulnerability. All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern that a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

15.6 The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in February 2024- UKCIS advice 2024. The school will have regard to this advice when managing these issues.

16 Online safety

16.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate and effective filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. Our filtering and monitoring systems also prevent access to harmful and inappropriate content accessed through generative AI tools and products.

16.2 These filtering and monitoring systems block harmful and inappropriate content, and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least every academic year) to ensure their effectiveness, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our learners.

16.3 We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe.

16.4 We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

16.5 Online safety risks can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users or generative AI applications that stimulate this, such as peer to peer pressure, and adults posing as children or young adults to groom or exploit children.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending, and receiving explicit images, including those, generated by AIsharing other explicit images, including those generated by AI and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing, or financial scams.

16.6 All staff are aware of these risk areas and should report any concerns to the DSL.

17 Handheld devices and cameras

17.1 The trust has a separate policy regarding the safe use of mobiles and cameras. This includes:

17.1.1 Personal devices are only to be used by staff when on a designated break away from the learners. At all other times, personal devices are to be switched off.

17.1.2 Trust devices are only to be used by staff for work purposes. Photographs and videos of the learners are only to be taken on school devices.

17.1.3 Images of the learners will only be used in accordance with our Data Protection Policy.

18 Domestic abuse

18.1 The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear, or experience the effects of abuse.

18.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse, between those aged 16 or over who are, or have been, intimate partners, or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, and emotional abuse.

18.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

18.4 Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

18.5 Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. The police will also notify us if they have reasonable grounds to believe a child may be a victim of domestic abuse. This ensures that the school has up-to-date safeguarding information about the child.

18.6 All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

19 Honour or faith -based abuse

19.1 Hour or faith-based abuse (HBA) encompasses actions taken to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

19.2 Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors, and we take them into consideration when deciding what safeguarding action to take.

19.3 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

19.4 **Female genital mutilation**

19.4.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.

19.4.2 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.

19.5 **Forced marriage**

19.5.1 A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse.

19.5.2 Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

19.5.3 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

19.5.4 Forced marriage is not the same as arranged marriage, which is common in many cultures.

19.5.5 If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

20 Radicalisation and extremism

20.1 Extremism is defined as vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process of a person legitimising support for, or use of terrorist violence.

20.2 Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions, and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

20.3 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

21 Staff/learner relationships

21.1 Staff are aware that inappropriate behaviour towards learners is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a learner under the age of 18.

21.2 We provide our staff with advice regarding their personal online activity, and we have clear rules regarding electronic communications and online contact with learners. It is considered a serious disciplinary issue if staff breach these rules.

21.3 Our Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

22 Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

22.1 If a safeguarding concern or allegation is made about a member of staff, supply teacher, volunteer or contractor or relates to incidents that happened when an individual or organisation was using the trust premises for the purposes of running activities for children, our set procedures must be followed. Please refer to our Safeguarding concerns and allegations made about staff, supply teachers, volunteers and contractors and procedures can be accessed on the schools SharePoint and the full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2026.

22.2 Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.

23 Whistle blowing if you have concerns about a colleague

23.1 It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the Headteacher / Head of School /CEO, unless the complaint is about the CEO, in which case concern should be reported to the Chair of Trustees.

23.2 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

23.3 The school's whistleblowing policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

24 Staff Trustee/PCCAB Training

24.1 Our staff receive appropriate safeguarding and child protection training (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our learners.

24.2 New staff and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff behaviour policy, how to report and record concerns and information about our DSL and deputy DSLs.

24.3 Our Trustees/PCCAB receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenges to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

24.4 Our safeguarding trustee receives additional training to empower them to support and challenge the DSL and support the delivery of high-quality safeguarding across the trust.

25 Safer recruitment

25.1 The Board of Trustees and our senior leadership team are responsible for ensuring we follow recruitment procedures which help to deter, reject, or identify people who might harm children. When doing so, we check and verify the applicant's identity, qualifications, and work history in accordance with Keeping Children Safe in Education 2025 and the local safeguarding partner arrangements.

25.2 All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

25.3 We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and request DBS checks where required by Keeping Children Safe in Education 2025. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

25.4 When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

25.5 The Trust maintains the single central record of recruitment checks undertaken in each of our schools. Please refer to our recruitment policy and procedures.

26 Site security and Lanyards

26.1 Whist on the school site, all member of staff and visitors must wear their lanyard around their neck so it is visible to the school community.

26.2 Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times.

27 Child protection procedures

27.1 Recognising abuse

27.1.1 Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

27.1.2 Keeping Children Safe in Education 2026 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse and neglect.

27.2 Taking action

27.2.1 Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- In an emergency take the action necessary to help the child, if necessary, call 999.
- Complete a record of concern form and report your concern to the DSL as soon as possible.
- Share information on a need-to-know basis only and do not discuss the issue with colleagues, friends, or family.

27.3 If you are concerned about a learner's welfare

27.3.1 Staff may suspect that a learner could be at risk. This may be because the learner's behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the learner the opportunity to talk and ask if they are okay.

27.3.2 If the learner does reveal that they are being harmed, staff should follow the advice below.

27.3.3 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability, and/or sexual

orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

27.4 **If a learner discloses to you**

27.4.1 If a learner tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- Remain calm and not overreact.
- Allow them to speak freely.
- Not be afraid of silences.
- Not ask investigative questions.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Not automatically offer physical touch as comfort.
- Let the learner know that in order to help them they must pass the information on to the DSL.
- Tell the learner what will happen next and give them an opportunity to ask questions about what will happen next.
- Complete the concern form and pass it to the DSL as soon as possible.
- Report verbally to the DSL even if the child has promised to do it by themselves.
- Let the learner know when they can expect to be updated or receive more information, emphasising that the learner can talk to them or the DSL at any time.

27.5 **Notifying parents**

27.5.1 The school will normally seek to discuss any concerns about a learner with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

28 Referral to children's social care

28.1 The DSL will make a referral to children's social care if it is believed that a learner is suffering or is at risk of suffering significant harm. The learner (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

29 Reporting directly to child protection agencies

29.1 Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the DSL, the deputies, the Headteacher / Head of School / CEO are not available, and a referral is required immediately.

30 Confidentiality and sharing information

30.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the DSL, Headteacher / Head of School / CEO.

30.2 **Sharing information**

30.2.1 The DSL will normally obtain consent from the learner and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent and will record the reason for deciding to do so.

30.2.2 Information sharing will take place in a timely and secure manner, and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

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

30.2.4 The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a learner or parent to see child protection records, they will refer the request to the Data Protection Officer.

30.3 **Storing information**

30.3.1 Child protection information will be stored separately from the learner's school file and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with our Retention and Destruction Policy.

30.3.2 Our Confidentiality and Information Sharing policy and our Retention and Destruction policy is available to parents and learners on request.

31 Special circumstances

31.1 Looked after children

31.1.1 The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

31.2 Children who have a social worker

31.2.1 Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

31.3 Work experience

31.3.1 The school has detailed procedures to safeguard learners undertaking work experience, including arrangements for checking people who provide placements and supervise learners on work experience which are in accordance with statutory guidance.

31.4 Children staying with host families

31.4.1 The school may make arrangements for learners to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the Keeping Children Safe in Education 20026 to ensure hosting arrangements are as safe as possible.

31.4.2 Schools cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where learners stay with host families abroad, we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our DSL will ensure the arrangements are sufficient to safeguard our learners, and will include ensuring learners understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

31.4.3 Some overseas learners may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable.

31.5 **Private fostering arrangements**

31.5.1 A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

31.5.2 Where a member of staff becomes aware that a learner may be in a private fostering arrangement, they will tell the DSL, and the school will notify the local authority of the circumstances.

Appendix One - Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and neglect and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff are also aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.

1 Physical abuse

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

1.1 **Indicators of physical abuse**

The following may be indicators of physical abuse:

- Having bruises, bleeding, burns, bites, fractures or other injuries.
- Showing signs of pain or discomfort.
- Keeping arms and legs covered, even in warm weather.
- Being concerned about changing for PE or swimming.
- An injury that is not consistent with the account given.
- Symptoms of drug or alcohol intoxication or poisoning.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying.
- Isolation from peers.

2 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of

another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

2.1 Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Inappropriate emotional responses, fantasies.
- Self-harm.
- Drug or solvent abuse.
- Running away.
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

3 Sexual abuse

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

3.1 Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Aggressive behaviour including sexual harassment or molestation.
- Reluctance to undress for PE or swimming.
- Anal or vaginal discharge, soreness or scratching.
- Bruises or scratches in the genital area.

- Reluctance to go home.
- Refusal to communicate.
- Depression or withdrawal.
- Isolation from peer group.
- Eating disorders, for example anorexia nervosa and bulimia.
- Self-harm.
- Substance abuse.
- Acquire gifts such as money or a mobile phone from new ‘friends’.

4 Neglect

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

4.1 Indicators of neglect

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food.
- Frequent tiredness.
- Frequently dirty or unkempt.
- Poor attendance or often late.
- Poor concentration.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones or to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.

- The child is left at home alone or with inappropriate carers.

Appendix Two - Related safeguarding policies

- Staff behaviour/code of conduct.
- Physical intervention and the use of reasonable force.
- Behaviour.
- Personal and intimate care.
- Complaints procedure.
- Tackling bullying.
- Physical contact.
- Safe working practice.
- Whistleblowing.
- SEN.
- Missing children.
- Recruitment and selection.
- Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers.
- Grievance and disciplinary.
- Staff/learner online communication.
- Handheld devices.
- Confidentiality and information sharing.
- Sexual exploitation.
- FGM.
- Forced marriage.