

# **The 3-18 Education Trust**

## **Safeguarding and Child Protection Policy**

***‘Every individual is in a great school.’***

**Approved: Autumn Term 2025**  
**Review: Autumn Term 2026**

[www.3-18education.co.uk](http://www.3-18education.co.uk)

## **Our Mission**

To celebrate the diverse nature, culture and identity of our individual schools, whilst collaborating and enjoying the benefit of the team.

## **Our Values**

### **Compassionate**

To show care and understanding towards others.

### **Accomplished**

To provide high quality education and training for all.

### **Resilient**

To be solution focused and able to intelligently manage challenges.

### **The 3-18 Education Trust**

101 Longden Road  
Shrewsbury  
SY3 9PS

Company Number: 08064698

## Policy Monitoring and Review

### Monitoring

The Chief Executive Officer will monitor the outcomes and impact of this policy on an annual basis.

### Review

|  |   |
|--|---|
| Member of Staff Responsible              | Chief Executive Officer   |
| Relevant Guidance/Advice/Legal Reference | <p>Legislation:<br/><a href="#">Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)</a><br/><a href="#">The Education (Independent School Standards) (England) Regulations 2003</a><br/><a href="#">Children Act 2004</a></p> <p>Statutory National Guidance/Standards:<br/><a href="#">Keeping Children Safe in Education</a> and any legislation or guidance (statutory/non-statutory) outlined or referenced within it.<br/><a href="#">Early years foundation stage (EYFS) statutory framework</a><br/><a href="#">Working Together to Safeguard Children</a> and any legislation or guidance (statutory or non-statutory) outlined or referenced within it.</p> <p>Local Procedures:<br/><a href="#">West Midlands Safeguarding Children Procedures</a><br/><a href="#">Shropshire Safeguarding Community Partnership (SSCP) Children's Threshold Document</a><br/><a href="#">Shropshire Safeguarding Community Partnership Allegations about staff/volunteers protocol</a></p> |
| Policy Adopted By                        | Board of Trustees   |
| Consultation                             | Local Governing Bodies  |
| Date of Policy                           | Autumn Term 2025  |
| Review Period                            | Annually  |
| Date of Next Review                      | Autumn Term 2026  |

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|  |                                     |
|--|-------------------------------------|
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|  | <b>Error! Bookmark not defined.</b> |
| <i>Detail how your DSL meets with other key SLT (attendance, behaviour lead, sendco) to<br/>ensure dots are joined (this has been detailed in the main policy as using the belonging<br/>framework as a base, but outline how these meetings look in your school).....</i> |                                     |
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## 1. Introduction

- 1.1. This policy applies to anyone working for, on behalf of, or representing The 3-18 Education Trust (Trust) including members, trustees, local governors, senior managers, staff, volunteers, contractors, agency staff and students on placement. This policy has been agreed by the Board of Trustees following guidance issued by Shropshire Council.
- 1.2. The policy is publicly available on each of the Trust school websites (and on request from the school) so that it can be accessible for our children, their families and anyone visiting and /or working with the Trust.
- 1.3. The policy aims to meet the requirements as outlined in Part 2 [Keeping children safe in education](#) and Part 3 [EYFS statutory framework for group and school-based providers](#) .

## 2. The Trust's Safeguarding Statement

### 2.1. The Trust believes that:

- All children have the right to protection from all types of abuse, neglect, exploitation and/or harm.
- Everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

### 2.2. This means that the Trust will:

- Not tolerate the abuse, neglect or exploitation of children. This includes never accepting and always challenging or raising concerns about words or actions which downplay, justify, or promote abuse, neglect, exploitation and/or harm. This applies to anyone who is part of, comes into, or works in any of the schools or settings.
- Be child centred<sup>1</sup> and ensure that we consider the best interests of children in everything that we do. This includes ensuring that we enable children's voices and experiences to be heard (using communication tools and advocacy if necessary); and that children are involved in and informed about the decisions being made about them.
- Ensure a safe environment for children to learn, grow and develop is provided and children feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse, neglect, exploitation and/or harm of a child.
- Ensure no child or group of children are treated less favourably by our schools than others.
- Be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who our schools know are more vulnerable to experiencing abuse, neglect, exploitation, harm or discrimination.
- Work in partnership with our school's children, their parents, carers, and other agencies.

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<sup>1</sup> See [Working Together to Safeguard Children](#): Chapter 1: A child centred approach  
The 3-18 Education Trust Safeguarding and Child Protection Policy

### 3. Key Terms

3.1. **Safeguarding** and promoting the welfare of children is defined in Working Together to Safeguard Children 2023 as:

- providing help and support to meet the needs of children as soon as problems emerge,
- protecting children from maltreatment, whether this is within or outside of the home, including online,
- preventing impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of children; and
- taking action to enable all children to have the best outcomes<sup>2</sup>:

3.2. **Child Protection** is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific children who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

3.3. **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

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

3.5. Children may be abused or harmed in a family or in an institutional or community setting by those known to them or, more rarely, by others.

3.6. Abuse or harm can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused or harmed by an adult or adults, or another child or children.

3.7. There are a number of types of abuse and safeguarding issues that could increase the risk that a child could be abused. These are further defined and explained in Part 1, Part 5 and Annex B of [Keeping children safe in education](#) .

3.8. **Staff** refers to all those working for or on behalf of the Trust, full or part time, temporary or permanent in either a paid or voluntary capacity. The exceptions to this term are trustees and local governors.

3.9. **Trustees** refers to those who are part of the Trust Board.

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<sup>2</sup> [Children's social care: national framework - GOV.UK \(www.gov.uk\)](#)



- 3.10. **Local Governors** refers to those who are part of the individual school's Local Governing Body.
- 3.11. **Child** includes everyone under the age of 18.
- 3.12. A **Parent** refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child.<sup>3</sup>

## 4. Roles and Responsibilities

- 4.1. The Trust follows the statutory guidance as set out in the latest [Keeping children safe in education](#) (and associated documents and guidance); adhering to the roles and responsibilities and expectations identified for:

### Trust Board

- 4.2. The Trust Board has a strategic leadership responsibility for ensuring our Trust takes a whole trust approach to safeguarding arrangements as outlined in this policy and that we comply with duties under the related legislation and guidance listed later in this policy. Keeping Children Safe in Education Part 2 outlines the key responsibilities. The Trust Board has delegated some responsibilities, although retains accountability, as follows.

### The Chief Executive Officer (CEO)

- 4.3. The CEO ensures:
- Each Trust school has a Designated Safeguarding Lead (DSL) who has the appropriate status and authority to carry out the duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
  - Each Trust school adheres to this policy and has procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with the Trust's duties under the related legislation and guidance listed later in this policy.
  - The Trust has adequate executive leadership by appointing:
    - Trust Safeguarding Lead (TSL): Claire Jones
    - Director of Inclusion (DoI): Sadie Howson
  - All staff are knowledgeable and confident in carrying out their safeguarding duties in line with training and the related legislation and guidance listed later in this policy.

### The Safeguarding Link Trustee

- 4.4. The Trust Board has appointed a Safeguarding Link Trustee who is responsible for meeting with the Trust Safeguarding Lead each term and reporting back to the Trust Board normally by a written report.

- 4.5. Safeguarding Link Trustee: Ann O'Brien

### Local Governing Committees (LGC)

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<sup>3</sup> S576 Education Act 1996

4.6. Under the Scheme of Delegation, the Trust Board has delegated monitoring of the effectiveness and implementation of safeguarding arrangements at school level to LGCs. Each individual LGC will appoint a Safeguarding Link Local Governor. Each Safeguarding Link Local Governor is responsible for leading on the governance oversight of safeguarding arrangements. They meet with the DSL on a termly basis and report back to the LGC normally by a written report after conducting site reviews and discussions around contextual themes with the safeguarding team within the school.

4.7. **The Safeguarding Link Local Governors for the Trust's schools are as follows:**

- Bowbrook Primary School:
- Bridgnorth Endowed:
- Coleham Primary:
- Hodnet Primary School:
- John Wilkinson Primary School:
- Much Wenlock Primary School:
- St Martins School:
- The Priory School:
- Thomas Adams School:
- William Brookes School:

4.8. The Chair of the LGC will liaise with the CEO in the event of an allegation of abuse made against the Headteacher as outlined in the Ensuring Safe Staff section of this policy.

## **Headteachers**

4.9. Headteachers are responsible (with the lead support of the DSL for each school) for ensuring safeguarding arrangements are implemented effectively in their school.

Responsibilities include:

- Having the overarching responsibility of ensuring the effectiveness of the school's safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the LGC (with the support of the DSL) on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in the Safeguarding Statement. This includes ensuring that the Senior Leadership Team (SLT) work effectively together and with the DSL, to ensure a whole school approach to safeguarding.
- Taking the lead role in ensuring the school implements safe practice including ensuring staff are knowledgeable and confident in their safeguarding practice and that practice is in line with national and local requirements. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liasing with the Local Authority Designated Officer (LADO) with the support of the DSL or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the DSL and any deputy(ies) to carry out their roles effectively. This means ensuring they are given sufficient time, training, support, resources, including cover arrangements where necessary.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.

- Ensuring that school policies relating to site safety and health and safety guidance and relevant legislation are in place, implemented and followed by all staff.

### **The Designated Safeguarding Leads (DSL)**

4.10. The DSL for each school takes the lead responsibility for safeguarding and child protection in their school. Annex C [Keeping children safe in education](#) outlines their key responsibilities. Deputy Designated Safeguarding Lead(s) (DDSL) support the DSL in the discharge of their responsibilities. Responsibilities include:

- Ensuring that the school has a Safeguarding and Child Protection Policy in place as required by [Keeping children safe in education](#), that is implemented and followed by all staff.
- Being available to deal with safeguarding and child protection during school hours. Each DSL will put in place cover arrangements for outside the school's day and term times where necessary. Details can be obtained by contacting the DSL.
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and to their school.
- Supporting the Headteacher to implement safe practice in their school.
- Managing safeguarding referrals to the relevant Local Authority; Police and any other statutory authorities or multi-agency risk management arrangements (see DSL Response).
- Working closely with the Trust, Headteacher and relevant SLT members to ensure a whole school safeguarding culture and ethos as outlined in the Trust's Safeguarding Statement and the implementation of effective safeguarding arrangements.
- Acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership, Telford and Wrekin Safeguarding Partnership and other Safeguarding Partnerships depending on the child's home local authority, as outlined in Working in Partnership section of this policy.
- Ensuring children and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to as outlined in Working in Partnership section of this policy.
- Acting as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in their school.
- Ensuring the effective management and oversight of safeguarding information as outlined in the Record Keeping and Information Security section of this policy.
- Maintaining records for staff and volunteers training.

### **All Staff (including students on placement and volunteers):**

4.11. All Staff are expected to work in line with the Trust's Safeguarding Statement and adhere to the policies, processes and systems of the Trust and each school that support safeguarding. This specifically includes:

- Accessing and maintaining professional development and support to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, respond and report staff Safeguarding concerns.

- Engaging in safe practice. This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of children as outlined in Ensuring Safe Staff section of the is policy.
- Teaching children how to keep safe.

## 5. Professional Development and Support

5.1. Within the Trust, to ensure all staff are knowledgeable and confident in keeping children safe in the schools, staff will complete the professional development activities as outlined below:

- Read information on school safeguarding arrangements and procedures as outlined in KCSiE 2025 (Part 1: page 8-9, paragraph 11)
- Read Keeping Children Safe in Education (KCSiE) and then complete a KCSiE quiz
- Complete Raising Awareness Child Protection training
- National and local Child Protection updates
- FGM training
- Prevent training
- Cyber Security training
- Online Safety training

5.2. This is the minimum requirement for Trust staff and schools will assess and monitor individual staff's training needs. Schools will maintain professional development records to monitor completion but will also be expected to revisit and check application of training to ensure safeguarding becomes at the heart of each school's culture.

5.3. The DSL and DDSL(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. The DSL and DDSLs receive regular support and supervision from within the school and from external providers when needed including from the Trust's Educational Psychologist who is trained in clinical supervision.

5.4. The minimum training requirements for staff, volunteers, DSLs, DDSLs, trustees and local governors and frequency are outlined in Appendix A

## 6. Ensuring Safeguarding Practice Across the Trust

### Safer Recruitment

6.1. The Trust adopts robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in any of the Trust's settings. All staff involved in recruitment complete additional safer recruitment training as outlined in the Professional Development and Support section of this policy. Recruitment procedures are outlined in the Trust's Safer Recruitment Policy and are in alignment with [Keeping children safe in education](#): Part 3 and EYFS Part 3.

6.2. As part of the Trust's recruitment and selection processes; we ensure that the commitment to safeguarding and promoting the welfare of children is evident to candidates throughout

each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. This policy is included in the application information for candidates. The Trust also ensures that all applicants complete a robust application form. Suitable references are sought, and online social media checks are carried out prior to interview; as well as ensuring that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

- 6.3. In accordance with Keeping Children Safe in Education 2025: Part 3; the Trust maintains a record of information received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students on placement), trustees, local governors, contractors, and visitors who attend the Trust in a professional capacity. The Trust complete the checks on staff, volunteers, trustees, and local governors who are recruited by the Trust. For those who are recruited by others; the Trust ensures receipt of written confirmation that the relevant checks have been completed and their identification checked before they are allowed to work unsupervised or engage in regulated activity with children.
- 6.4. Where all the necessary information has not been obtained or there are gaps in the information, the Trust has robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability does not work unsupervised or engage in regulated activity with children. The Trust reserve the right to refuse access to any Trust site for any person who the Trust is not assured is safe to work or engage in regulated activity with children.
- 6.5. On appointment, staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of the Trust's settings.
- 6.6. If any safeguarding concerns or allegations arise relating to a member of staff, trustee, local governor or other person working on the Trust's school premises, staff are expected to act in line with the sections Ensuring Safe Staff and Staff Safeguarding Concerns: Recognise, Respond, Report within this policy.

## **Contractors**

- 6.7. The Trust has several contracts with external providers to work in schools including with children. Each school writes to these contractors on an annual basis seeking written confirmation that all the necessary safeguarding checks have been carried out on all contractors coming into school. This information is then logged on each school's Single Central Record of which the Trust has oversight of centrally for an additional layer of security. A robust process is in place in each school when contractors arrive on site to ensure that the necessary checks have taken place before they are allowed entry into school.

## **Visitors**

- 6.8. The Trust has procedures for recording the details and confirming the identity of visitors, including prospective candidates for employment and volunteering through the use of a visitors log which is linked to the school's Single Central Record. We ensure that schools have control over who comes into the schools' premises so that no unauthorised person has unsupervised access to children.

- 6.9. When external speakers or visitors attend schools' premises (whether for school or [non-school activities](#)); schools conduct due diligence checks to ensure that their views and delivery of material continues to ensure our school is a safe place. This continues to ensure the Trust are [Teaching our children how to keep safe](#); as well as promoting fundamental British Values and community cohesion (please also see [Preventing Radicalisation](#)).

#### **Work experience (*Secondary Schools/Colleges only*)**

- 6.10. The schools have processes in place to ensure that individuals or companies who provide work experience placements for children have appropriate safeguarding policies and procedures in place. They ensure that any adults who are supervising children on work experience have the appropriate checks carried out as required by [Keeping children safe in education](#): Part 4: Adults who supervise children on work experience”.
- 6.11. If a child's work experience placement is in a “specified place” where regulated activity is carried out (such as an education or childcare setting); schools will work with the provider to ensure that the appropriate checks and/or risk assessments are carried out.
- 6.12. Schools will manage work experience placements through a digital platform called Unifrog so that schools and parents have visibility of the checks completed as well as behaviour expectations and who to raise concerns to.

#### **Use of School Premises for Non-School Activities.**

- 6.13. When extra-curricular activities out of school hours are arranged in any Trust schools, which are directly supervised/managed by school staff, this Safeguarding and Child Protection Policy is to be followed and any concerns should be managed in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.
- 6.14. The Trust will follow the Ensuring Safe Staff procedures as outlined below if it becomes aware of any allegations relating to an organisation or individual using school premises.
- 6.15. Where schools have sessions or activities which are provided by another person or organisation that is using any school site and not during school time or under direct supervision, each school will seek assurances that the person or organisation has the required child safeguarding arrangements in place as an individual/organisation as outlined in [Keeping children safe during community activities and Visitors](#). This is regardless of whether children who are on roll at our school access the activity or not.
- 6.16. The requirements for safeguarding arrangements will be set out within any transfer of control agreement, (i.e. lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

## **7. Ensuring Safe Staff**

### **Managing allegations (including low level concerns)**



7.1. In all Trust settings, an open and transparent culture is promoted in which all concerns about the behaviour or conduct of any adults working in, at or on behalf of the Trust are dealt with appropriately.

7.2. There are two levels of allegations/concerns:

**1. Allegations that may meet the harm threshold.**

7.3. Circumstances where someone working within the Trust has or may have:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have occurred outside of a Trust setting that could pose a transferable risk.

7.4. Allegations that someone that working in, at or on behalf the Trust has met the harm threshold should be immediately referred to the school's Headteacher or Trust Safeguarding leads in person. Staff may be required to provide a written statement at the request of the Headteacher.

7.5. If the allegation relates to the Headteacher; this should be immediately reported to the CEO verbally.

7.6. If there is any conflict of interest or immediate risk of harm to a child or; then the person with the concern must ensure immediate safety and contact the Local Authority Designated Officer (LADO) in accordance with Shropshire Safeguarding Community Partnership Managing Allegations Procedures.

7.7. In most cases; the Headteacher (or the TSL) will lead on managing allegations; with the support of the Trust's HR and the DSL. They will ensure that Part 4 [Keeping children safe in education](#) and [Shropshire Safeguarding Community Partnership Managing Allegations Procedures.](#) are applied. Any allegations that meet the above criteria will be referred to the LADO within 1 working day and the Trust will follow their advice and guidance.

7.8. Where schools have nurseries, they will notify OFSTED as soon as reasonably practical and within 14 days of the allegation first being made, informing them of action taken by completing the online form.

7.9. It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fair and consistent way, to effectively safeguard all those involved.

7.10. The Trust also has a duty of care towards staff, and will provide a named contact for the staff member.

7.11. If necessary, the Trust will adhere to the legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in [Keeping children safe in education](#) if the criteria for such reporting is met.

## **2. Allegations / concerns that do not meet the harms threshold (low-level concerns).**

- 7.12. The term low-level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:
- Is inconsistent with the Trust's Code of Conduct for Staff, including inappropriate conduct outside of work. The Code of Conduct outlines examples of what could be considered a low-level concern.
  - Does not meet the harm threshold at point 1 above.
- 7.13. Low-level concerns should be reported in person to the DSL and/or Headteacher; to embed the culture of openness and transparency and to ensure that the Trust's values and expected behaviours are lived, monitored, and reinforced by all staff.
- 7.14. On receipt of a report of a low-level concern, the Headteacher/DSL will gather as much information as possible.
- 7.15. The Headteacher will decide the outcome of all low-level concerns (in consultation with the DSL and/or TSL if necessary). Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

## **Whistle Blowing**

- 7.16. Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the school's arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of children.
- 7.17. If staff have such concerns; these should be raised with the DSL, Headteacher or TSL.
- 7.18. Please also refer to the Trust's Whistleblowing Policy available on the website.
- 7.19. If staff feel unable to raise concerns with the Trust directly, they can contact:
- [NSPCC Whistleblowing Advice Line](#). NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
  - Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
  - Ofsted provides guidance on how to make complaints about a childcare and education providers: [Complaints procedure - Ofsted - GOV.UK](#)
  - General guidance on whistleblowing can be found via: [Whistleblowing for employees: What is a whistleblower - GOV.UK](#)

## **8. Record Keeping and Information Security**

- 8.1. The Trust has a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). There are data protection processes in place to ensure that we keep and process (manage) personal information about children, their families; staff and others safely and lawfully. This includes:



- Securely manage electronically held information in line with [Meeting digital and technology standards in schools and colleges](#) and [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](#) (see also [Online Safety](#))
- Manage requests for access to personal information held by the Trust (known as subject access requests).
- Details of processes and how to request access to personal information held are outlined in The Data Protection Policy and Subject Access Request Procedure. See [Data protection in schools - Guidance](#) ; [Information Commissioners Office Guidance for Organisations](#) and/or [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](#)

## **Storage and Management of Safeguarding Information (Child Protection files)**

- 8.2. Safeguarding concerns and responses for individual children are kept electronically and securely in each of our Trust's schools on CPOMS. Each school has a robust system in place whereby only DSLs are able to view safeguarding files for individual children.
- 8.3. If any of the Trust's schools are provided with Child Protection files when children are transferred into the school, they are stored securely and individually for each child and are separate to a child's main pupil file. The DSL is responsible for ensuring the quality, maintenance, and management of Child Protection files; as well as using the system to monitor themes and patterns of concern to inform and continue to improve the whole Trust approach to safeguarding.

## **Graduated approach to monitoring information**

- 8.4. The DSL team will regularly review safeguarding chronologies in conjunction with other relevant senior leaders such as SENDCO, Attendance lead, Behaviour lead as part of our Trust approach to reviewing the whole child through planned pupil meetings using our **Belonging Framework: Appendix F**. This approach ensures that the needs of the whole child are considered and more targeted intervention can be considered.
- 8.5. Students will be reviewed regularly (no less than termly) using the staged approach within the framework and chronology of intervention and support will be recorded on student files.

## **Sharing Safeguarding Information**

- 8.6. The Trust is proactive in sharing information internally and with others who are working with children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse, neglect, exploitation and/or harm.
- 8.7. Staff are expected to share information with one another as part of their work in school about the needs and risks of children on a need-to know basis in line with the Trust's Safeguarding Statement so that children are kept safe and their welfare promoted. Staff are not permitted to share information with friends, family, or anyone in the local community outside of their work.

## **Sharing Information with Other Organisations**

- 8.8. Staff should be familiar with and use the DfE's [Information sharing advice for safeguarding practitioners](#).

8.9. As part of work in partnership with parents and children; consent to share their information with others outside of school should always be sought from a child and their parent(s) unless it is not safe to do so. This includes where seeking consent would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

8.10. If a parent or child does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a child safe and promoting their welfare. Therefore, staff must make parents and children aware that information may still be shared with other organisations if necessary to help keep their child safe or promote their welfare or if there is another legal basis to do so.

8.11. Decisions to share safeguarding information with other organisations will be overseen by the DSL (refer to DSL Response section of this policy). The Designated Safeguarding Lead will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including rationale for those decisions. This should include instances where referrals have or have not been made to another agency.

### **Transfer of Child Protection Files and Other Safeguarding Information**

8.12. When a child leaves for a new education setting; the DSL will arrange for the Child Protection file (and any additional information to assist the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term. Where the move is planned, the DSL will consider sharing information in advance of the child leaving to help with the child's transition and to enable any help and support they may need. The Trust will use the [Shropshire Transition in Education Guidance \(safeguarding children at educational transition points\) | Shropshire Learning Gateway](#) to guide our practice approach. This is shared separately to any child's main file and confirmation of receipt of the files should be gained (refer to Appendix C: File Transfer Record and Receipt).

8.13. If a child is absent from education or Electively Home Educated; our schools share relevant information with the Local Authority as required by law (refer to Children Potentially at Greater Risk of Harm section of this policy). If the child leaves one of our Trust's schools and does not move to a new education setting; their Child Protection file (and any additional information as necessary) is transferred to the relevant Local Authority that they reside in line with the local protocol.

## **9. Working in Partnership**

9.1. In order to ensure all children in the Trust's schools are effectively safeguarded, and their welfare is promoted, we will work in in partnership with children, their parents and other agencies/partnerships as follows:

### **Children**

9.2. Children are taught how to keep safe; including how and when to share or report any worries or concerns they may have about their safety and wellbeing or that of others.

Depending on the setting, the Trust encourages children to share and report worries and concerns via various methods such as tellus@ email addresses, worry boxes, pastoral departments. **For information relating to a specific school, please see Appendix E: School specific safeguarding procedures.**

9.3. Staff are expected to build trusted relationships with and work in the best interests of children in line with the Trust's Safeguarding Statement, and recognise, respond and report concerns as outlined in the Staff Safeguarding Concerns: Recognise, Respond, Report section of his policy.

9.4. We actively seek children's views of safety in schools through a range of activities appropriate to the setting including periodic pupil surveys and meetings with trustees and/or local governors. These are reviewed at Trust level to ensure we can support schools with helping children to feel safe within all settings.

## Parents

9.5. The Trust recognises the importance of working together with and supporting parents to safeguard and promote the welfare of their children. This includes:

- Meeting with parents prior to children starting in EYFS to request information relating to the child's routines, likes/dislikes, special dietary requirements, intolerances/allergies and allergy actions plans and request parents inform schools of any changes to these throughout the school year.
- Communicating to parents how we keep children safe in the schools (including online). This policy is made available to all parents through each of the schools' websites and in paper copy on request. Each school ensures the existence of this policy is promoted at all appropriate conversations and/or events. If parents want to raise concerns or complaints about how the Trust keeps their children safe; they can do this using the Complaints Policy which is available on the Trust's and schools' website.
- Actively seeking parent views of safety in school through periodic parent surveys, events involving parents and meetings with trustees and/or local governors.
- Encouraging parents to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. Staff are expected to respond to any parents who raises worries or concerns to them either about their child(ren) or others in line with Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.
- Ensuring, through the DSLs, that schools work with parents to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see DSL Response) in line with the local arrangements in the Local Authority where they live.
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority where they live and/or Enforcement Agencies.
- Providing parents with regular information, guidance and external support available to them by newsletters; specific pages on our websites; running sessions for parents; signposting to external agencies.
- **For information relating to a specific school, please see Appendix E: School specific safeguarding procedures.**

## Other Agencies/Partnerships

9.6. As the Trust operates in Shropshire, it engages and co-operates with the local safeguarding arrangements. The local safeguarding partnership is the Shropshire Safeguarding Community Partnership (SSCP). We also engage and co-operate with other Local Authorities (e.g. Telford and Wrekin), depending on where our pupils live. The Trust engages and co-operates by:

- Ensuring the Trust effectively safeguards and promotes the welfare of children living in Shropshire in line with the DfE's [Working together to safeguard children](#) and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the [SSCP Threshold Document](#). Where children do not live in Shropshire but attend a Trust school; we will work in line with the relevant local arrangements in their home area.
- Ensuring the Trust works with other agencies and comply with other pieces of relevant statutory guidance in safeguarding children potentially at greater risk of harm.
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure high quality education and support to children in Shropshire is provided.
- Participating in the local Operation Encompass Arrangements; an arrangement where police notify schools when a child who attends their school may have been subject or witness to police-attended incidents of domestic abuse. This enables the Trust to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of the Trusts participation in Operation Encompass [School Operation Encompass – Shropshire Learning Gateway \(shropshirelg.net\)](#).

## 10. Teaching Children How to Keep Safe

10.1. The Trust recognises that educating children in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. There is a clear set of values and standards that provide opportunities for children to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through -

- The Trust Safeguarding Statement
- Behaviour/Anti-Bullying Procedure
- Preventing Radicalisation (within this policy)
- The Trust approach to Online Safety
- The Trust Personal Social Health and Education and Computing curriculum and policies including the RHE/RSHE Policy. The Schools' RSHE programmes are compliant with [Relationships and sex education \(RSE\) and health education - GOV.UK](#) and developed to be fully inclusive of all ages and stages of development and consideration of children's needs including children potentially at greater risk of harm; and addresses issues as outlined [Keeping children safe in education](#); Part 2: Opportunities to teach safeguarding.

- 10.2. The DSL, RHE/RSHE lead and other key members of the SLT (such as computing, Mental Health and SENDCo) will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in our schools.

## 11. Online Safety

- 11.1. The use of information and communication technology (ICT); is a vital part of the everyday functioning of life in the schools. The Trust also recognises the important role ICT plays in the lives of children and their families.
- 11.2. Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; which are summarised in the following categories:
- **content:** being exposed to illegal, inappropriate, or harmful content.
  - **contact:** being subjected to harmful online interaction with other users.
  - **conduct:** online behaviour that increases the likelihood of, or causes, harm to children or others.
  - **commerce:** illegal, inappropriate, or harmful online commercial activities that can compromise the health and wellbeing or security of children or others.
- 11.3. The Trust adopts a whole trust approach to online safety which aims to safeguard and educate children and their families, staff, visitors, trustees, and local governors in the use and management of ICT (including the use of camera enabled; mobile and personal devices and the ICT systems in place). Our Online Safety policies outlines our approach.
- 11.4. Where settings have Early Years provision, we ensure safeguarding procedures include all electronic devices with imaging and sharing capabilities, not just mobile phones and cameras. The Trust adheres to [Safeguarding children and protecting professionals in early years settings: online safety considerations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/safeguarding-children-and-protecting-professionals-in-early-years-settings) and [Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK](https://www.ncsc.gov.uk/early-years)
- 11.5. Although the direct responsibility of each school's DSL, The Trust ensures appropriate arrangements for filtering and monitoring and cyber security which adhere to the digital standards for filtering and monitoring. This is provided by Student Content Keeper for all schools. More information about our filtering and Monitoring practices can be found in the Online Safety document.
- 11.6. Where there are online safety concerns involving identified children (including child-on-child abuse); staff will follow Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Safeguarding Response sections of this policy.
- 11.7. Any school cyber security incidents will be reported to [Action Fraud \(National Fraud and Cyber Crime Reporting Centre\)](https://www.actionfraud.org.uk) and, if there is a data breach this will be reported in line with our Data Protection Processes to the [Information Commissioners Office](https://ico.org.uk). Please also see Record Keeping and Information Security.

- 11.8. Where children are being asked to learn online at home, we follow advice from the Department of Education; Safeguarding and remote education . The Trust's approach to remote learning is outlined in the Remote Learning Policy.
- 11.9. The Trust reviews the online safety arrangements annually to ensure the [Keeping children safe in education](#) and [Safeguarding children and protecting professionals in early years settings: online safety considerations](#) online safety standards (including the digital standards for [filtering and monitoring](#) and [cyber security](#); as well as following guidance on [Safe use of generative AI in education: module 3 - GOV.UK](#)). are met. Any risks arising from the reviews are clearly recorded as part of each school's evaluation and improvement action planning processes. These are reported to and overseen by the school's LGC.
- 11.10. All staff, senior leaders, trustees and local governors are appropriately trained to enable them to ensure effective online safety arrangements. We will respond to online safety incidents which indicate safeguarding concerns in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

## 12. Preventing Radicalisation

- 12.1. The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being drawn into terrorism. Schools fulfil this duty by:
- Promoting fundamental British Values as part of Trust values and curriculum (refer to relevant policies).
  - Ensure that all schools provide a "safe space" for children to understand and discuss sensitive topics, those linked to radicalisation and terrorism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.
  - Be alert to and identify children who may be [susceptible to radicalisation into terrorism](#) and where it is assessed as appropriate by the Designated Safeguarding Lead; make a Prevent referral (in line with the local [Preventing Terrorism Processes](#))
  - Monitor and report any hate-based behaviour as part of the Behaviour and Child-on-Child Abuse Policies (Hate related incident reporting processes can be found [here](#)).
  - Outline in the Online Safety and Relationship Sex Health Education Policies (include any other curriculum subjects related policies) how children are being safeguarded from being drawn into terrorism.
  - Ensure that hosting external speakers or visitors that attend school premises are suitable and appropriately supervised (please also refer to [Visitors](#))
  - Assess the risk of children being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in schools' evaluation processes; and inform their approach to online safety (including filtering and monitoring and cyber security arrangements).
- 12.2. The Trust has a nominated DSL as our Prevent Lead who is responsible for liaising with our regional Prevent Lead from the DFE and sits on the local Prevent Board to receive regular updates which are then disseminated across the schools.



- 12.3. The Trust regularly reviews the adherence to the Prevent Duty and ensures that schools review the practice through a prevent risk assessment annually. Any actions arising from the assessment are included in school evaluation and improvement action planning processes. These are reported to and overseen by the school's LGC.
- 12.4. All staff, senior leaders, trustees and local governors are appropriately trained (see Appendix A Professional Development and Support Minimum Training Requirements) to enable them to ensure that all children, particularly those who may be susceptible to extremist ideology and radicalisation are effectively safeguarded. The Trust responds to children who are identified as being susceptible to an extremist ideology in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.
- 12.5. In addition to the annual training, key DSLs across the Trust are undergoing Prevent 'Train the Trainer' CPD which is delivered by the DFE to further improve the capacity for continued CPD across all of our staff.

### **13. Children Potentially at Greater Risk of Harm**

- 13.1. The Trust recognises that whilst all children should be protected, some groups of children are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups above; this potentially further increases their vulnerability.

#### **Children Who Need a Social Worker (Child in Need and Child Protection Plans).**

- 13.2. Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or complex family circumstances. A child's experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.
- 13.3. The schools work closely with external agencies to ensure the appropriate support is in place. Please refer to the specific school policy for further details.

#### **Looked After Children and Previously Looked After Children.**

- 13.4. The most common reason for children becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in their own and their family's lives.
- 13.5. All schools within the Trust ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements. All Trust schools have an appointed designated teacher who works with the local authority to promote the educational achievement of registered pupils who are looked after.
- 13.6. The name of each designated teacher will be in the Appendix E: school specific safeguarding procedures.

- 13.7. Please also refer to the DfE statutory guidance - Designated teacher for looked after and previously looked after children.

### **Children who attend Alternative provision**

- 13.8. The cohort of pupils in Alternative Provision often have complex needs, and the Trust are aware of the additional risk of harm that children accessing alternative provision may be vulnerable to. Where schools place a child with an alternative provision provider, the Trust continues to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the child.
- 13.9. Schools obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e., those checks that the Trust would otherwise perform in respect of its own staff, and ensure that any alternative provision commissioned is effective and compliant with [Keeping children safe in education](#) (Part 2) and [Alternative Provision Department for Education](#).
- 13.10. The schools will conduct an initial site visit to ensure they conduct a health and safety site check as well as checking all relevant certification of staff. In addition to this, all children attending alternative provision will have a 6-weekly review of the provision to ensure suitability. Each school will also monitor attendance and apply appropriate attendance codes in line with [Working together to improve school attendance](#)

### **Children who are absent from or are not in receipt of full-time education**

- 13.11. Children aged 5-16 are legally entitled to a full-time education, suitable to any special educational need. Education is essential for children's progress, wellbeing and wider development and being in school is a protective factor against wider harms including exploitation.
- 13.12. Children being absent from education including those accessing early years provision for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect (including Educational Neglect) or child exploitation; as well as other needs. The Trust's response to persistently absent pupils and children who are absent from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.
- 13.13. Please refer to each school's Attendance policy and Children with health needs who cannot attend school policy for further information about our Trust's process and procedures relating to absence.
- 13.14. The Trust refers to and uses Statutory Guidance on Children missing in education to ensure they comply with the duties regarding children missing education. This includes notifying the Local Authority in line with the Shropshire Council Children missing education process when removing a child from the school roll at standard and non-standard transition points.

### **Children Who are Electively Home Educated.**



13.15. Many home-educated children have an overwhelmingly positive learning experience. The Trust would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. When a parent notifies schools that they wish to deregister their child to electively home educate them, the school will immediately notify the local authority.

13.16. Schools will work closely with parents and the local authority to ensure this is in the best interests of the pupil and will always seek to meet with parents to discuss the request to ensure that they have considered what is in the best interests of each child. Where a child has special educational needs or disability, and/or has a social worker, schools will liaise with the relevant departments and professionals to coordinate a joined up discussion.

### **Children who have experienced multiple suspensions and are at risk or have been permanently excluded**

13.17. It is important that children in the Trust schools know and understand how we expect them to behave and the Trust ensure that schools are a safe place where all children feel safe and are able to learn. Serious, harmful and/or repeated behaviour by children will always be responded to. Such behaviour can be a sign or indicator that a child has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse, neglect, exploitation or some other form of adverse experience in their life.

13.18. The Trust Behaviour Policy outlines the expected standards of behaviour for children, as well as how the school will support and respond to children with additional needs (including Special Educational Needs and Disabilities), or whose needs or circumstances might affect their behaviour. Where a child's behaviour also indicates a safeguarding concern; staff will adhere to Staff Safeguarding Concerns: Recognise, Respond, Report.

### **Children Requiring Mental Health Support**

13.19. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Children who have mental health needs will often need early help or support to avoid their safety and welfare being compromised.

13.20. If there are concerns that a child's mental health needs may place them at risk of harm (for example concerns about suicidal ideation or attempts, self-harm, eating disorders etc); then staff will adhere to [Staff Safeguarding Concerns: Recognise, Respond, Report](#).

13.21. Each Trust school has a senior mental health lead who is a member of or supported by the senior leadership team. The name of each lead can be found in Appendix E: School specific safeguarding procedures. [Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK \(www.gov.uk\)](#)

### **Children with Special Education Needs Disabilities or other Health Issues.**

- 13.22. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.
- 13.23. The Trust recognises that additional barriers can exist when recognising abuse and neglect in this group of children (e.g. assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration). Schools have trained pastoral teams who work closely with both the SENDCos and DSLs to ensure appropriate support and monitoring is in place. These teams also work with external professionals and signpost families to the SEND local offer as per the [SEND code of practice](https://next.shropshire.gov.uk/the-send-local-offer/): <https://next.shropshire.gov.uk/the-send-local-offer/>.
- 13.24. For more information on Trust schools' specific support for students with SEND please refer to the Trust SEND policy and schools' SEN information reports.

### **Children who are lesbian, gay, bisexual or gender questioning**

- 13.25. The fact that a child or a young person may be lesbian, gay bisexual or gender questioning is not in itself an inherent risk factor for harm, online and offline, however, children who are in these groups can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning can be just as vulnerable as children who already identify within these groups.
- 13.26. All schools and staff will ensure inclusivity of children who may identify within this group and provide both a safe space and trusted adults for students to be able to share their concerns. Schools teach this topic sensitively as part of the statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education curriculum.

## **14. Child-on-Child Abuse**

- 14.1. As set out in the Trust's Safeguarding Statement; the Trust will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse.
- 14.2. The Trust works to ensure that no child-on-child abuse takes place in its schools. However, the Trust understands that children telling staff that they are experiencing abuse from other children cannot be relied on. Staff should understand that even if there are no reports in their school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their Professional Development and Supervision, which do not just rely upon children telling someone. Staff across the Trust are expected to follow our Appendix D: Child-on-Child Abuse Procedures.
- 14.3. Each of the Trust's schools monitor patterns of child-on-child incidents including those involving abuse, to ensure that schools are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and Trust responses to it are reported to and overseen by each school's LGC.

- 14.4. This section should be read in conjunction with the Trust Behaviour Policy section on bullying behaviour as evidence indicates that perpetrators of such behaviour are likely to have previously been victims of abuse, neglect, exploitation and/or harm themselves. In most instances, schools will use the Trust Behaviour Policy to support the conduct of students towards each other, however where behaviour is considered to be abusive or indicate potential safeguarding concerns, staff will raise concerns to the DSL and both the victim and perpetrator must be reviewed as victims with appropriate support provided.

## 15. Staff Safeguarding Concerns: Recognise, Respond, Report

### **Be alert and curious!**

Pay attention to possible **signs or indicators** of abuse/harm to the child from the child themselves or others either from your own observation or what the child/others tell you. Consider:

Apppearance

Behaviour

Communication.

**Do not just rely on a child telling you** (there are lots of reasons why they won't)

- 15.1. Any child in any family could become a victim of abuse, neglect, exploitation and/or harm. Abuse and safeguarding issues are complex; and can often involve a child experiencing multiple issues or types of abuse.
- 15.2. Staff should always maintain the attitude that abuse “could happen here”. Staff should be particularly alert to Children potentially at greater risk of harm and vigilant in identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse/harm.
- 15.3. As well as maintaining their Professional development and accessing support; staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: [Keeping Children Safe in Education](#) : Part 1 and Annex B. and [SSCP - Contacts and Definitions](#).
- 15.4. **Signs and indicators** of concern may be evident in spaces and places where children spend time (including when online). They may be present in the child or others around them (including adults or children); in their:
- **Appearance**
  - **Behaviour**
  - **Communication**
- 15.5. Signs and indicators can be recognised by staff through:
- **Concerns shared directly by a child:** *Staff must not rely* on children telling them they are experiencing abuse, neglect or exploitation. Children may not recognise, feel ready, know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with the Trust’s Safeguarding Statement; and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with children.

- **Observations:** In person or online (including online behaviour in school) of a child or someone else (for example a parent, someone working or visiting the school).
- **Concerns shared by others:** either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the school or individual children.

15.6. **Other systems in place:** For example, online filtering and monitoring systems and reporting or information from other agencies through working in partnership etc.

15.7. There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse. Signs and indicators could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need for early help and support. In such circumstances, staff are still expected to respond in line with this policy.

## 16. Respond

### Ensure the immediate safety of the child potentially at risk.

#### If there is immediate danger;

Take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and [refer child protection concerns](#))

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or [Appendix B: Child-on-Child Abuse Procedures](#) as applicable).

Seek views/gather relevant information (if safe to do so).

**Remember: LISTEN** (don't investigate), **REASSURE** (don't promise) and **EXPLAIN** you will be reporting the concerns.

### Immediate safety

16.1. If a child is in immediate danger; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow [Multi-agency Referral: Reporting concerns \(MARF\)](#) )
- Work in line with our Behaviour Policy and Use of reasonable force in schools guidance.
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the Ensuring safe staff.

### Other relevant policies/processes

16.2. Staff may need to follow other school safeguarding policies/processes (see Linked Policies) as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are

concerns of child-on-child abuse; Appendix D: Child-on-Child Abuse Procedures should be referred to.

## **Injuries**

- 16.3. Each of the Trust's schools request parents notify the school of any accidents or injuries to their child before attending school. The school will make a written record of the notification along with any injuries the child may have. Should a child receive any injuries during school time; staff will follow the accident reporting and first aid procedures.

## **Seek views and gather information from the child and others.**

- 16.4. Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:
- Children (where appropriate and depending on the circumstances and their role with children);
  - any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see Record Keeping and Information Security section of this policy)
  - Their parents (if necessary and depending on the circumstances and their role).
- 16.5. Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to When Concerns are Directly Shared by a Child section below.
- 16.6. Views should always be sought unless it is not safe to do so. This includes where seeking views would:
- Place the child at increased risk of significant harm.
  - Place any other at risk of injury.
  - Obstruct or interfere with any potential Police investigation.
  - Lead to unjustified delay in making enquiries about significant harm.
- 16.7. If needs for help and support are identified; parents and children should always be asked for their consent to share information with other organisations individuals so that help and support can be provided to them. If consent is not given; staff should follow guidance in the Recording Keeping and Information Security: Sharing Safeguarding Information with Organisations section in this policy.
- 16.8. Any uncertainty about seeking views should be discussed with the DSL. Decisions to share safeguarding concerns with other organisations without consent will be reported to and overseen by the DSL.
- 16.9. If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views such as Emotional Literacy Support Assistants, Makaton/BSL, Lego therapy and Drawing and Talking.

## When Concerns are Directly Shared by a Child

- 16.10. Children are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.
- 16.11. When children share the details of or feelings about abuse, neglect or exploitation, the process of sharing can sometimes take time. Children may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the child may share in the appearance, behaviour or other forms of communication (refer to 'Recognise' earlier in this section).
- 16.12. It takes a lot of courage for a child to share that they feel unsafe or are experiencing abuse, neglect, exploitation and/or harm. There are many reasons why children do not share their experiences (for example, uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).
- 16.13. When children are sharing their concerns; staff should:
- **Listen to the child:** Please refer to this [NSPCC poster](#).
  - **Remain calm:** the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
  - **Explain it can't be a secret:** Staff must explain to the child that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.
  - **Reassure:** offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
  - **Seek the child's views:** use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.
  - **Explain what will happen next:** If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.
  - **Report and record** the conversation immediately as outlined in the Reporting concerns section.
  - **Seek support** if you feel distressed from the DSL team. Support can also be sought from members of the Trust's HR team and the Trust support service VIVUP.

**Where there is an immediate risk of significant harm:**

**Report in person** to the Designated Safeguarding Lead as soon as possible.

**Record** your concerns, decisions, actions and outcomes on the safeguarding recording system.

**If concerned about a member of staff or someone else in the school;** report in line with Ensuring safe staff.

## **17. Report**

### **Report to Designated Safeguarding Lead**

17.1. All safeguarding concerns must be reported to the DSL as soon as they are recognised and after the initial response to the child and others. Staff are expected to verbally report their concerns to the DSL.

17.2. Where concerns involve an allegation of harm or a low-level concern about someone working in or at the school; staff must follow Ensuring safe staff.

### **Record concerns**

17.3. All safeguarding concerns must be recorded by the staff member in writing on the secure platform CPOMS and the DSL alerted to the concern.

17.4. Where physical injuries to a child form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map (within the CPOMS incident log).

17.5. Each safeguarding concern record should include:

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

17.6. If staff are unsure of the recording requirements staff should seek advice from the DSL.

## **18. Designated Safeguarding Lead Response**

18.1. Safeguarding concerns can be raised by staff as above; but may also be raised to the DSL by:

- Children, parents, or visitors to the school.
- Other agencies (see Working in Partnership section of this policy)
- The school's ICT filtering and monitoring systems.

18.2. The DSL will:



### Consider and Assess the Concern.

18.3. Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The DSL will use and refer to the following:

- [Working Together to Safeguard Children 2023](#) (particularly Chapters 1 and 3)
- [Keeping children safe in education](#)
- [SSCP Threshold Document](#)
- [Other relevant local tools and pathways \(West Midlands Procedures\)](#)
- If applicable [Appendix B: Child-on-Child Abuse Procedures](#)
- If applicable [Understanding and identifying radicalisation risk in your education setting](#)
- [When to call the Police - information for schools](#)

### Decide on What Action to Take.

18.4. Once the concern has been considered and assessed; the DSL will decide on action(s) to be taken. They may wish to delegate actions to other members of staff, in the best interests of the child. The DSL will assist the Headteacher with decisions relating to staff in school.

18.5. In making decisions, the DSL will work in partnership with the Headteacher; relevant staff/senior leadership team in line with their Roles and Responsibilities and any other organisations as appropriate (see Working in Partnership and Record Keeping and Information Security).

### Actions could include one or more of the below

- **Manage internally:** in alignment with school policies and processes including offering support to the child and their family through the school pastoral support (Universal/School Early Help) offer in a way which addresses the needs/risks identified. This may also include actions to make locations/infrastructure in school (including online) safer; adapt the curriculum to ensure the school is teaching our children how to keep safe, or Working in Partnership.
- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring the child or their family enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise concerns to Children's Social Care** in line with the [SSCP Thresholds document](#) and [relevant local tools and pathways](#).
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police.

18.6. Where there is possible criminal behaviour by a child (including in circumstances of child-on-child abuse); we will take account of [When to call the police: guidance for schools and colleges](#). Other local referral processes will also be followed as applicable: including referring to relevant multi-agency forums and processes as outlined in [relevant local tools and pathways](#) (e.g. to [Prevent Radicalisation](#); ensure [Online Safety](#); respond to domestic abuse: [Multi-Agency Risk Assessment Conference](#)).



### **Record Actions, Decisions, and Outcomes.**

- 18.7. Record everything on the child protection file and in line with Record Keeping and Information Security. This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see Working in Partnership). The Designated Safeguarding Lead will keep detailed, accurate, written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency.

### **Manage and Oversee any Ongoing Response.**

- 18.8. Once the initial actions are taken, the DSL will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a child. Where this is decided, they will ensure that the school works in partnership with the child; parents, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.
- 18.9. The [SSCP Escalation/Resolution of Professional Disagreements Policy](#) will be used to challenge, resolve and if necessary, escalate any concerns the school may have when working with other agencies in safeguarding children.

## **19. Linked Policies and Procedures**

Behaviour Policy including Anti Bullying Strategy

Staff Behaviour Policy / Code of Conduct

Whistleblowing

Health & Safety

Allegations of Abuse against staff

Attendance

RSHE

Complaints

SEND

Remote Learning

First Aid

Online Safety, including staff use of mobile phones/ devices with imagery and sharing capacity.

Risk Assessments

Safer Recruitment

Disciplinary and grievance

Intimate Care

Data Protection/GDPR Guidance

## Appendix A Professional Development and Support Minimum Training Requirements

### All School Staff (including Volunteers)

| Activity   | Frequency  |
|--|--|
| Receive information on school safeguarding arrangements and procedures as outlined in <a href="#">Keeping children safe in education</a>   | Induction or when arrangements/procedures are updated.   |
| Read <a href="#">Keeping children safe in education</a> (KCSiE):<br><b>All Staff:</b> Part 1; Part 5 and Annex B.<br><b>Senior Leadership Team:</b> Entire document<br><b>Staff who do not work directly with children:</b> Annex A<br><b>Schools with Early Years:</b> Part 3 of EYFS framework | Induction then annually (in Autumn Term) or when updated.  |
| Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns  | Induction and then every 2 years   |
| Teaching staff (including early years) only: Complete FGM training appropriate to role (see Local Authority Safeguarding in Education Training Statement at: <a href="#">Early Years and Schools Training and Consultancies   Shropshire Learning Gateway</a> )                                  | Induction and then every 2 years   |
| Complete Prevent Awareness Training appropriate to role (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> )  | Induction and then annually.   |
| Complete Cyber Security Training (training packages are available at: <a href="#">Cyber security training for school staff - NCSC.GOV.UK</a> )   | Induction and then annually  |
| Complete Online Safety Training (training packages are available at National College ( <a href="#">Annual Online Safety Training &amp; Certificate for Teaching Staff (nationalcollege.com)</a> ))   | Induction and then annually  |
| Receive regular national and local safeguarding updates (including those relating to online safety) to help maintain basic skills and keep up to date with any changes to safeguarding procedures or as a result of any safeguarding concerns that occur in the setting.                         | Termly updates will be provided by the Trust's Safeguarding consultant.<br>This may be done via email. |

### DSLs (including DDSLs)

| Activity (in addition to all staff above)  | Frequency   |
|--|---|
| Complete Schools DSL Training to a standard as outlined in KCSiE Annex C   | On induction in role and then every 2 years                         |
| Read <a href="#">Keeping Children Safe in Education</a> in its entirety.   | Induction into role then annually (in Autumn Term) or when updated. |
| Maintain knowledge and development relating to the role of DSL including updates on using the Brooke Traffic Light Tool and other relevant national resources. | As required, but at least annually                                  |

### Trust Central Team (TCT)

| Applies To    | Activity   | Frequency              |
|---------------|--|------------------------|
| All TCT staff | Receive information on each trust school's safeguarding arrangements and procedures as outlined in KCSiE | Induction and annually |

|                               |  |  |
|-------------------------------|--|--|
|                               | 2023 (Part 1: page 7, paragraph 13). This must include a list of each school's DSLs and clear guidance on what to do if safeguarding concerns arise whilst a member of the team is working at one of our schools.  |  |
| All TCT staff                 | Read <a href="#">Keeping Children Safe in Education</a> (KCSiE):<br>Part 1; Part 5 and Annex B.<br>Annex A<br>Complete KCSiE quiz  | Annually   |
| Executive Team                | Read <a href="#">Keeping Children Safe in Education</a> (KCSiE):<br>Entire document<br>Complete KCSiE quiz   | Annually   |
| All TCT staff                 | Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns (see Local Authority Safeguarding in Education Training Statement <a href="#">here</a> ) | Induction and then every 2 years   |
| All TCT staff                 | Complete Prevent Awareness Training appropriate to role (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> )  | Induction and every 2 years  |
| All TCT staff                 | Complete Cyber Security Training (training packages are available at: <a href="#">Cyber security training for school staff - NCSC.GOV.UK</a> )   | Induction and then annually  |
| All TCT staff                 | Complete Online Safety Training (training packages are available at National College ( <a href="#">Annual Online Safety Training &amp; Certificate for Teaching Staff (nationalcollege.com)</a> ))   | Induction and then annually  |
| All TCT staff                 | Receive regular national and local safeguarding updates (including those relating to online safety).   | Termly updates will be provided by the Trust's Safeguarding consultant.<br>This may be done via email. |
| Executive Team and HR Manager | Complete Safer Recruitment training and Safer Working Practices training   | Induction and every 3 years  |
| Finance Director              | Safer Working Practice training  | Induction and every 3 years  |

#### Staff involved in recruitment of staff (including administration)

| Activity<br>(in addition to other relevant training as outlined above)                   | Frequency   |
|--|---|
| Read Part 3: <a href="#">Keeping Children Safe in Education</a>                          | Induction into role then annually (in Autumn Term) or when updated. |
| Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE) | Induction and every 3 years (or when KCSiE Part 3 is updated)       |

## All Trustees and Local Governors

| Activity  | Frequency  |
|---|--|
| Complete Governance Safeguarding Training to equip them with the knowledge to carry out their strategic roles and responsibilities.   | Induction and then every 2 years.                                    |
| Read <a href="#">Keeping Children Safe in Education</a><br>All trustees and local governors: Part 1; Part 2 and Annex B.<br>Chairs and Safeguarding Link Trustees and Local Governors: Entire document      | Induction into role then annually (in Autumn Term) or when updated). |
| Complete Cyber Security Training (training packages are available at: <a href="#">Cyber security training for school staff - NCSC.GOV.UK</a> )  | Induction and then annually  |
| Complete Online Safety Training (training packages are available at National College ( <a href="#">Annual Online Safety Training &amp; Certificate for Teaching Staff (nationalcollege.com)</a> ))          | Induction and then annually  |
| Complete Prevent Awareness Training appropriate to role (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> ) | Induction and every 2 years.   |

## Appendix B Alternative Provision Quality Assurance Checklist **Under review**

| Alternative Provision Quality Assurance Checklist  |  |                                  |                   |
|--|--|----------------------------------|-------------------|
| Name of alternative provision:   |  |                                  |                   |
| Name of person completing checklist (from host school):  |  |                                  |                   |
| All agencies and settings who place pupils at alternative provision MUST quality assure the placement.                       |  |                                  |                   |
| This quality assurance document must be completed prior to working with a new alternative provision and annually thereafter. |  |                                  |                   |
|  |  | On file/<br>evidence of<br>check | Date &<br>Initial |
| 1  | If this quality assurance check is a review, please confirm the date of previous assurance check.  |                                  |                   |
| 2  | Is the alternative provision registered as an independent school with the DfE? Y/N<br>The criteria to be registered as an independent school is that;<br>- full-time <sup>1</sup> education is provided for five or more pupils of compulsory school age<br>Or<br>- full-time education is provided for one or more pupils with an EHC plan or who is "looked after" by a local authority<br><br><sup>1</sup> - There is no legal definition of what constitutes 'full-time' education. However, DfE would consider an institution to be providing full-time education if it is intended to provide, or does provide, all, or substantially all, of a child's education. |                                  |                   |
| 3  | What is the provider's DfE number? (If applicable)   |                                  |                   |
| 4  | Copy of signed Service Level Agreement (SLA) /contract (attached)  |                                  |                   |
| 5  | Is there a clear governance structure within the Alternative provision? Y/N  |                                  |                   |
| 6  | Does the referral process include the requirement for a detailed pupil profile from the host school prior to agreement of placement? Y/N   |                                  |                   |
| 7  | Pupil's attendance should be monitored daily. Is this included in the SLA? Y/N<br>Copy of providers Attendance policy attached.  |                                  |                   |
| 8  | Is there a procedure for when pupils fail to attend or the placement breaks down? Y/N  |                                  |                   |
| 9  | Is there adequate access to resources for all pupils who access the provision? Y/N   |                                  |                   |
| 10   | Is there inclusive practice with regards to positive behaviour management, attendance and punctuality? Y/N<br><ul style="list-style-type: none"> <li>Pro-actively promote and support the regular attendance of pupils</li> <li>Effective reward/incentive strategies to promote participation</li> </ul>  |                                  |                   |
| 11   | Is there regular assessment and review of pupil progress? Y/N<br>Provision agrees to share weekly progress reports   |                                  |                   |
| 12   | Are risk assessments completed for activities that pupils may undertake? Y/N (copy attached)   |                                  |                   |
| 13   | Is there a full and clear pupil induction procedure regarding health and safety and fire evacuation? Y/N   |                                  |                   |

|    |  |  |  |
|----|--|--|--|
| 14 | Are there robust procedures in place (including information sharing that are referenced in the SLA) to safeguard children in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N<br>Copy of providers Safeguarding/Child protection policy attached.   |  |  |
| 15 | Has evidence of staff receiving accredited child protection training been seen? Y/N<br>Has evidence of DSL receiving training for their role been seen? Y/N<br>Have contact details for DSL been provided? Y/N (attached).   |  |  |
| 16 | Copy of public liability insurance document attached.  |  |  |
| 17 | Is there a policy for when members of staff are working alone with pupils? Y/N (copy attached)   |  |  |
| 18 | Does the provider have an online safety policy in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N (copy attached)  |  |  |
| 19 | Copy of health and safety policy attached.   |  |  |
| 20 | Has written confirmation from the provider that staff vetting checks have been undertaken been received? Y/N<br>Checks include;<br><ul style="list-style-type: none"> <li>an identity check;</li> <li>a barred list check;</li> <li>an enhanced DBS check/certificate;</li> <li>a prohibition from teaching check;</li> <li>further checks on people who have lived or worked outside the UK</li> <li>a check of professional qualifications, where required;</li> </ul> and<br><ul style="list-style-type: none"> <li>a check to establish the person's right to work in the United Kingdom.</li> </ul> Has confirmation of these checks been added to the Single Central Record? |  |  |
| 21 | Is there a Designated First Aid Officer and suitable equipment available? Y/N<br><ul style="list-style-type: none"> <li>Qualified First Aiders identified</li> <li>Recording system for accidents including informing host school and home</li> <li>Historical or current RIDDOR investigations</li> <li>Evidence of full first aid kit</li> </ul>   |  |  |
| 22 | Has confirmation been received from the provider that a representative will attend or contribute to multi-agency meetings when necessary? Y/N  |  |  |

#### Action Plan

If 'no' is answered to any of the questions in Part 2 an action plan must be formulated to obtain information

| Action reference number. | Area for improvement | Intended action |
|--------------------------|----------------------|-----------------|
|                          |                      |                 |

Signed by host school:

Date:

Signed by Alternative Provision:

Date:

## Appendix C: File Transfer Documentation

### PART 1: To be completed by sending / transferring setting, school or college.

|  |  |
|--|--|
| NAME OF CHILD:                               |  |
| DOB:   |  |
| NAME OF SCHOOL/SETTING SENDING CP FILE:      |  |
| ADDRESS OF SCHOOL / SETTING SENDING CP FILE: |  |
| METHOD OF DELIVERY:                          | BY HAND    SECURE POST    ELECTRONICALLY |
| DATE FILE SENT:                              |  |
| NAME OF DSL TRANSFERRING FILE:               |  |
| NAME OF PERSON TRANFERRING TO:               |  |
| SIGNATURE:                                   |  |

### PART 2: To be completed by receiving setting, school or college.

|   |  |
|---|--|
| NAME OF SCHOOL / SETTING RECEIVING FILE:    |  |
| ADDRESS OF SCHOOL / SETTING RECEIVING FILE: |  |
| DATE RECEIVED:                              |  |
| NAME OF PERSON RECEIVING FILE:              |  |
| DATE CONFIRMATION OF RECEIPT SENT:          |  |
| SIGNATURE:                                  |  |

*Receiving School: Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.*

## Appendix D: Child-on-child Abuse Procedures

Our Trust aims to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Expecting all staff, trustees and local governors in our Trust's school to ensure they are adhering to and promoting the commitments made in the **Safeguarding Statement**.
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that DSLs and other relevant staff have completed training in how to assess and respond to child-on-child abuse. **For further detail; please refer to Professional Development and Support.**
- Being clear how children are expected to behave towards one another. Our Trust's Behaviour Policy outlines these expectations; how our schools will support children to understand and fulfil them; and how they will prevent and respond to behaviour which falls below expected standards. Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring Teaching children how to keep safe is implemented.
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that Children who are more vulnerable to child-on-child abuse are not disproportionately impacted by child-on-child abuse in our schools.

### What is child-on-child abuse?

Child-on-child abuse:

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; child-on-child abuse can take place in spaces and at times of the school day where children are less likely to be supervised. Where child-on-child abuse is taking place outside of school (including online) this abuse can also continue and have an impact on a child when they are at school.
- Can be defined in different ways (examples are outlined in [Keeping children safe in education](#) Part 1; Child-on-child abuse and Part 5).
  - A child may experience one or multiple types of child-on-child abuse at the same time.

### Children who are more vulnerable to child-on-child abuse

Please read this alongside Children Potentially at Greater Risk of Harm section of this policy.

Children who are perceived to be different to others can be particularly vulnerable to child-on-child abuse. When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other



form of adverse experience<sup>4</sup> in their life. Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-child abuse is harmful to all children involved.

- Evidence<sup>5</sup> indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes children who:
  - Have special education needs and/or disabilities and/or health issues.
  - Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
  - Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
  - Are from Black, Asian and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias<sup>6</sup>.
    - Are Lesbian Gay, Bi-Sexual; Gender Questioning. These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
    - Are female. Girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.
    - Are male. Boys are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

### When is child-on-child behaviour considered abusive?

Our Trust recognises the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse.

In considering whether behaviour is abusive; staff should consider:

- **The impact on the child(ren) affected by the behaviour:** Any behaviour that is likely to have an impact on a child's physical and emotional health and development should be considered potentially harmful. The greater the impact of the behaviour on the child's health and development; the greater level of harm caused to them.

The needs and circumstances of the child who is identified as being potentially harmed should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

---

<sup>4</sup> See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

<sup>5</sup> Evidence sources:

- [Keeping children safe in education](#) Part 2: Children potentially at greater risk of harm.
- [Prevalence of bullying \(anti-bullyingalliance.org.uk\)](#).
- [Safeguarding d/Deaf and disabled children | NSPCC Learning](#);
- [Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning](#);
- [Safeguarding LGBTQ+ children and young people | NSPCC Learning](#);
- [Spotlight #3: Young people and domestic abuse | Safelives](#).
- [Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

<sup>6</sup> [Adultification bias within child protection and safeguarding \(justiceinspectors.gov.uk\)](#)

Even where children do not/are not able to express their wishes and feelings; staff should also pay attention to other potential signs/indicators of abuse (please refer further to Staff Safeguarding Concerns: Recognise, Respond, Report section in this Policy)

Children raising child-on-child concerns either for themselves or others will be taken seriously and never be given an impression they are creating a problem.

- **The behaviour of the child(ren) who is/are causing harm:** It is important to consider the behaviour of children on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a child who is causing harm to other children could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).
- Features of abusive behaviour<sup>7</sup> can include:
  - A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
  - A misuse of power over the child who is being harmed. (please also see children who are more vulnerable above).
  - Victimisation of the child who is being harmed. This could also include circumstances where the child causing harm is supported or joined by other children.
  - Intrusive behaviour; not considering or enabling the child being harmed to freely agree and/or consent to the behaviour.
  - An element of control; coercion and/or force.
  - Physical/sexual violence (this does not always have to be present; but where it is so would heighten the level of concern).
  - Evidence that a child is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

### **The Trust's response to child-on-child abuse**

In most instances, our schools will use our Behaviour Policy to manage the conduct of children towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns; then staff will also need to raise such concerns to the DSL in line with the Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.

In responding to any concern of child-on-child abuse; schools will take account of:

- Part 5 [Keeping children safe in education](#)
- [Use of reasonable force in schools](#)
- [Searching, screening and confiscation at school](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [When to call the police: guidance for schools and colleges.](#)

### **Risk and needs assessment.**

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<sup>7</sup> Adapted from Hackett Continuum as described in [Understanding sexualised behaviour in children | NSPCC Learning](#). When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see [Farrer and Co \(2022\) page 35-36](#))

All staff will immediately consider how best to support and protect all children involved in child-on-child abuse incidents; ensuring they act in their best interests.

The school may deem it necessary to complete a formally recorded risk and needs assessment for all children involved in child-on-child abuse incidents. The decision to complete a formal risk assessment will be taken by the DSL. This formal assessment will always take place where there is evidence of violent or abusive behaviour.

The purpose of the risk and needs assessment is to safeguard all children involved (including children who may not be at the school, such as siblings) and will clearly outline the strategies to be put in place to mitigate risk and address any identified needs.

The risk and needs assessment will be completed; taking account of information from all key staff (and relevant involved professionals) working with the children, as well as their parents/carers. It will also include the views and feelings of the children; where this is safe and appropriate to do so.

The risk assessment will be shared with all staff and relevant involved professionals who work with the children; as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

In circumstances where children are displaying sexual behaviour towards other children that raises concern; our DSL is trained in and will use the Brook Traffic Light Tool to inform the risk and needs assessment.

Our schools' template risk and needs assessment can be found within their personalised policies on their websites.

## Response

The parents/carers of **all involved children** will be notified of and involved in the school's response. The school will only share the details of other children to parents/carers who do not have parental responsibility for them where the school has consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to Record Keeping and Information Security section of this policy)

The risk and needs assessment will inform the response taken. The following responses will be considered; (more than one response can be considered):

- Manage internally in alignment with the school's Behaviour Policy and pastoral support offer in a way which addresses the needs/risks identified. Any sanctions imposed on the child causing harm will be proportionately balanced with any other responses (such as police involvement) and take account of risks and needs; as well as the ongoing impact on/risk to the child who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt the curriculum to ensure we are Teaching Children How to Keep safe and areas from Working in Partnership section of this policy.
- Offer Early Help/Targeted Early Help. This could include offering and/or referring any child involved to enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- Raise concerns to Children's Social Care in line with the [SSCP Thresholds document](#).
- Report to the Police. The school will take account of [When to call the police: guidance for schools and colleges](#).

## Recording and monitoring

All child-on- child abuse concerns and responses will be recorded and stored on the child protection files of all involved children (Please refer to Record Keeping and Information Security section in this policy). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on CPOMS/Arbor.

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## Appendix E: School Specific Safeguarding Procedures

At William Brookes School, we follow the Trust policy to ensure we embed a culture of safeguarding at the heart of our practice. We want all children to come to school with the ability to thrive and achieve a sense of belonging within school and their wider community. Below outlines school-specific procedures to support this.

### Working Ways:

Parents, staff, students, and external agencies work together to identify and address concerns early through information sharing. Parents can get in contact with school in a variety of ways including face to face, telephone and email. Students can speak to any member of staff in school to raise a concern, staff members all have access to CPOMS and all incidents are logged for information and reviewed by the safeguarding team to agree the correct category and next actions needed.

Information updates for parents are shared via our Spotlight newsletter, Facebook page or emailed directly. Students receive updates through assemblies, PSHE curriculum, or workshops focused on a particular topic.

### Children potentially at greater risk of harm

Working with Other Agencies and Facilitating Meetings At William Brookes School, we are committed to supporting our students holistically by working collaboratively with a range of external agencies.

This includes:

- Regular **multi-agency meetings** to ensure coordinated support for students and families.
- **Early Help assessments** and reviews, facilitated by our designated staff, to identify needs and provide timely interventions.
- Liaison with health professionals, social workers, educational psychologists, and the Mental Health Support Team.
- **Safeguarding and pastoral APDR meetings**, where concerns are discussed and referrals are made as appropriate.
- **Transition planning meetings** for vulnerable students, including those with SEND or Looked After Children (LAC).
- Use of **digital platforms** to share information securely and efficiently with external partners.

We ensure that meetings are inclusive, well-documented, and focused on clear outcomes for the child or young person by all staff completing Assess, plan, do and review cycles to collect evidence of need.

Key Staff Supporting Vulnerable Groups

**SEND/CO: Ruth Bennett**

Oversees provision for students with Special Educational Needs and Disabilities (SEND), including EHCPs, interventions, and liaison with external specialists.

**Designated Teacher for Looked After Children (LAC): Ruth Bennett**

Ensures that LAC students receive appropriate academic and emotional support, and that their Personal Education Plans (PEPs) are up to date.

**LAC Coordinator: Caroline Tilley**

Works closely with the Designated Teacher to monitor progress and wellbeing of LAC students and liaise with Virtual School Heads.

**Early Help Coordinator: Donna Picken (DSL)**

Responsible for initiating and monitoring Early Help support, coordinating with families and external agencies to ensure needs are met.

**Mental Health Lead: Lisa Hennessy**

Leads on mental health strategy and implementation. The school's Mental Health Action Plan is available on the staff shared drive and outlines our approach to promoting wellbeing, identifying concerns, and accessing support.

At William Brookes School if staff have an immediate concern about a child's mental health, they follow the normal safeguarding procedures. As a school we work with Mental Health Support team who provided a qualified mental health practitioner.

**Teaching our children how to keep safe**

At our school, safeguarding is at the heart of our curriculum design. We use safeguarding data not only to meet statutory requirements but to proactively shape a curriculum that responds to the real and emerging needs of our pupils.

[Using Safeguarding Data to Inform Curriculum](#)

We regularly analyse safeguarding data—including concerns logged on CPOMS, attendance patterns, behaviour incidents, and Early Help referrals—to identify vulnerabilities and risks affecting our pupils.

This data informs:

- PSHE Curriculum Planning: Topics such as healthy relationships, consent, emotional regulation, and resilience are prioritised based on trends in safeguarding data.
- Assemblies and Theme Weeks: We respond to emerging issues (e.g., peer-on-peer abuse, vaping, online challenges) with targeted assemblies and enrichment activities.
- Staff Training: Trends in safeguarding data guide our CPD programme, ensuring staff are equipped to address current issues (e.g. online grooming, mental health first aid).

[Reviewing Data for Patterns and Trends](#)

We conduct regular safeguarding reviews with the DSL team and senior leaders to:

- Identify emerging risks (e.g., increase in self-harm disclosures, online bullying, or inappropriate content sharing).

- Adapt curriculum content accordingly (e.g., introducing lessons on digital footprints, privacy settings, or managing peer pressure).
- Collaborate with external agencies (e.g., police) to deliver workshops or interventions tailored to identified needs.

This cyclical review ensures our curriculum remains dynamic and responsive.

### Online Safety Integration

Online safety is embedded across the curriculum and reinforced through:

- Computing lessons: Covering topics such as cyberbullying, phishing, fake news, and safe social media use.
- PSHE and RSE: Exploring the emotional impact of online interactions, sexting, and digital consent.
- Whole-school initiatives: Participation in Safer Internet Day, parent workshops, and pupil-led campaigns.

We also use data from online safety incidents (e.g., misuse of devices, exposure to harmful content) to refine our Acceptable Use Policies and educate pupils on responsible digital behaviour.



## Appendix F: The Belonging Framework

