

Child Protection and Safeguarding Policy

Policy Owner	Director of Safeguarding and SEND
Approval by	Trust Board
Date approved	August 2025
Review date	August 2026

Contents

Statement of intent

Acronyms

Definitions

1. Legal framework
2. Roles and responsibilities
3. Sexual harassment
4. Multi-agency working
5. Early help
6. Children missing from education
7. Child abduction and community safety incidents
8. Modern slavery
9. FGM
10. Radicalisation
11. Mental health
12. Consensual and non-consensual sharing of indecent images and videos
13. Context of safeguarding incidents
14. Children and young people potentially at greater risk of harm
15. Use of academy premises for non-academy activities
16. Concerns about children and young people
17. Concerns about staff and safeguarding practices
18. Allegations of abuse against staff
19. Communication and confidentiality
20. Safer recruitment
21. Monitoring and review

Appendices

1. Specific Safeguarding Concerns
2. Recording of concerns in MyConcern

Statement of intent

Three Spires Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every child and young person, both inside and outside of our academies' premises. We implement a trust-wide preventative approach to managing safeguarding and child protection concerns, ensuring that the wellbeing of children and young people is at the forefront of all action taken and that healthy relationships are promoted. The trust is also committed to a zero-tolerance policy with regards to sexual harassment and violence.

This policy has been created to outline a clear framework relating to any aspects of safeguarding within the trust and should be followed by:

- All members of staff.
- All volunteers.
- Any core member academy** within the trust.
- All local academy committees and committees of the trust board.
- All governors
- All trustees and the board of trustees.
- All members and the board of members.
- The trust as a whole, including trust staff.
- Any associate members of the board of trustees and/or its committees.

***of note, associate member academies have their own individual child protection and safeguarding policies and do not follow the Three Spires Trust policy.*

At Three Spires Trust, we seek to support our children and young people to embrace life in all its fullness. Jesus spoke these words in the early days of his ministry in a time when the world was facing significant challenge; this is not unrecognisable in modern Britain. Through this policy, we seek to empower adults to act with children at the heart of their decision making and action taking, whilst ensuring that record keeping means that children will have the very best opportunities to flourish, no matter what their life experiences. As a Church of England trust, this is not just an ideal, but it is at the core of our purpose.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that board of members, board of trustees, principals and trust and academy staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the Designated Safeguarding Lead (the DSL) or deputy DSL (DDSL) within their academy.
- Ensuring children and young people are taught how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any child or young person that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.

- Ensuring that principals and any new staff and volunteers within the trust are only appointed when all the appropriate checks have been satisfactorily completed.

Throughout this policy, the phrase parents and / or carers is used. In all other policies, the use of the word “parents” refers to all who carry out the role of a parent in a child’s life.

Safeguarding contacts at Three Spires Trust

Role	Name	Contact email
Director of Safeguarding and SEND	Sarah Milne	smilne@threespirestrust.org
Assistant Director of Safeguarding	Louisa Cain	lcain@threespirestrust.org
Trustee with responsibility for Safeguarding	Julie Pilmore	jpilmore.trustee@threespirestrust.org

Name of academy	Local Authority	DSL and contact details	Name of DDSL(s)	To contact the Safeguarding Champion
Hanley St Luke's Church of England Academy	Stoke-on-Trent	Mrs Zoe Cooper office@hanleystlukes.com	Miss Cartwright-Davies Mrs Emma Facey	Heather Emery via office@hanleystlukes.com
St Giles' and St Georges' Church of England Primary Academy	Staffordshire	Mrs Catherine Pointon headteacher@stgg.org.uk	Mrs Jessica Williamson Mrs Helen Booth	Sue Taylor sue.taylor@stgg.org.uk
St Michael's Church of England Primary Academy	Wolverhampton	Mrs Elizabeth Morton emorton@stmichaelsceprimary.co.uk	Mrs Kate Jackson Mrs Helen-Marie Navratil	
St Peter's Collegiate Academy	Wolverhampton	Mr Jonathan Hall Jhall@stpetersacademy.org.uk 01902 558600	Mrs Madison Hammond Mr Josh Franklin Mr Daniel Sherriff	Ben Gilhooly (bgilhooly@stpetersacademy.org.uk)
St Thomas' Church of England Primary Academy	Staffordshire	Mrs Debbie Cooke d.cooke@stthomascofeacademy.org 01782 787099	Mrs Donna Pierpoint Miss Steph Viggars	Cressida Dickens (clerk.kidsgrove@threespirestrust.org)
St Regis Church of England Academy, Wolverhampton	Wolverhampton	Mr Tom Barradas-Lingard tbarradas-lingard@stregisacademy.org	Ms Trudy Bird Ms Sarah Douglas	Teresa Badger (tbadger.governor@threespirestrust.org)

		01902 558333	Ms Kayleigh Nicholls-Owen	
The King's Church of England Academy, Kidsgrove	Staffordshire	Mrs Zoe Holdcroft zholdcroft@thekingscofeacademy.org 01782 783281	Mrs Sharon Harrison	Hayley Miller (clerk.kidsgrove@threespirestrust.org)

*Please note that throughout this policy, there is reference to the role of the Principal, some of these roles are held by Headteachers, Principals and Heads of School.

Child Protection referral routes in our local authorities

Local Authority	Service Name	Referral details
Cheshire East	CHECS	0300 123 5012 CHECS@cheshireeast.gov.uk
Staffordshire	Staffordshire Children's Advice Service	0300 111 8007
Stoke-on-Trent	Children's Advice and Duty Service	01782 235100
Wolverhampton	Wolverhampton Safeguarding Together	01902 555392

Prevent referral routes for our local areas

Local Authority	Email	Telephone
Staffordshire and Stoke-on-Trent	prevent@staffordshire.pnn.police.uk	01785 232055
Wolverhampton	safer@wolverhampton.gov.uk	01902 551214

LADO (Local Authority Designated Officer) contacts in our local authority areas

Local Authority	Name	Referral details
Staffordshire	Team of LADOs	0300 111 8007 No generic email contact details Online referral form: Staffordshire LADO referral form
Stoke-on-Trent		01782 235100 No generic email contact details
Wolverhampton	Kelly Matthews	01902 550661 LADO@secure.wolverhampton.gov.uk LADO@wolverhampton.gov.uk

Acronyms

This policy contains a number of acronyms used in Education. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CIN	Child in Need	A form of planning to support a child under Section 17 of the Children and Families Act 2014. This level of support is a multi-agency process which requires parental consent. In pathfinder local authorities, this is referred to as Family Help.
CP	Child Protection	A statutory form of planning to support a child under Section 47 of the Children and Families Act 2014. This level of support is a multi-agency process which, although encouraged, does not require parental consent.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a academy.
DDSL	Deputy Designated safeguarding lead	A member of staff who deputises for the DSL operationally only.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, academies, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in academy with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018.

DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the academy.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for children and young people who have significant needs that impact on their learning and access to education. The plan identifies any statutory support needs and / or interventions and the intended impact they will have for the children and young people.
ESFA	Education and Skills Funding Agency	An agency sponsored by the DfE with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	The UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out school and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.

AC	Academy Committee	The group of locally appointed governors who are a delegated committee of the board of trustees, responsible for the governance of a named academy.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of academies.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the UK and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in LA care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which children learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all children and young people. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the academy in a non-visitor capacity.
SENCo	Special educational needs coordinator	A statutory role within all schools and academies maintaining oversight and coordinating the implementation of the academy's special educational needs and disabilities (SEND) policy and provision of education to children with SEND.
SEND	Special Educational Needs and / or Disabilities	A child or young person has special educational needs and disabilities if they have a learning difficulty and/or a disability that means they need special health and education support.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in an academy / a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school headteacher	Virtual school headteachers are in charge of promoting the educational achievement of all the children looked

		after by the LA they work for, and all children who currently have, or previously had, a social worker. In addition, the role also includes those in kinship care.
--	--	---

Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

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

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **“sexual harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of academy. Sexual harassment is likely to violate a child and / or young person’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting and downblousing.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including children and young people and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between children and young people of sexually explicit content, including indecent imagery. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

We recognise that in some local authorities, there are ‘family help plans’ replacing ‘Child in Need’ plans. For the purposes of this policy, Family Help and Child in Need (Section 17) processes are interchangeable.

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Children and Families Act 2014
- Safeguarding Vulnerable Groups Act 2006
- The Education (Academy Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2025) 'Keeping children safe in education'
- DfE (2024) 'Working Together to Safeguard Children'
- DfE (2023) 'The Prevent duty'
- [gov.uk \(2024\) 'Prevent guidelines for England and Wales'](#)
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Academy Trust Handbook'
- DfE (2023) 'Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England, including pupil movement'
- [DfE \(2025\) 'EYFS Framework for Group and School-Based Providers'](#)

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

- DfE (2024) 'Behaviour in Schools'
- DfE (2022) 'Recruit teachers from overseas'
- **DfE (2025) 'Generative artificial intelligence (AI) in education' – policy paper**
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'
- Church of England Education Office (2016) 'Church of England Vision for Education: Deeply Christian, Serving the Common Good'

Policies and documents

This policy operates in conjunction with the following academy-level and trust-wide policies:

- Prevent Duty Risk Assessment
- Anti-bullying Policy
- Data and Cyber-security Breach Prevention and Management Plan
- Data Protection Policy
- Photography and Images Policy
- Records Management Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff (including Low Level Concern) Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Behaviour Policy
- Attendance and Absence Policy
- **Alternative Provision Policy**
- **Online Safety Policy**
- **Artificial Intelligence Policy**

Please note that 'MyConcern' is referred to as the reporting system throughout this policy. It is important to note that at St Michael's Church of England Primary Academy, the system used is CPOMS. The system being used does not affect the processes or the procedures found within this policy.

Roles and responsibilities

The board of trustees is responsible for:

- Ensuring that there is a named trustee with responsibility for safeguarding across the Trust.
- Understanding its safeguarding duties and keeping up-to-date with legislation and statutory guidance.

- Making sure that the academies within the trust have effective safeguarding policies and procedures in place and monitoring the implementation of these policies regularly.
- Ensuring that the Director of Safeguarding and SEND has received appropriate training.
- Receiving regular reports from the Director of Safeguarding and SEND on safeguarding to the board of trustees delegating operational responsibilities.
- Sharing the strategic leadership responsibility for the trust's safeguarding arrangements with the Director of Safeguarding and SEND.
- Ensuring that every academy within the trust complies with its duties under the above child protection and safeguarding legislation.
- Guaranteeing that the policies, procedures and training opportunities in the academies within the trust are effective and comply with the law at all times.
- Guaranteeing that each academy within the trust contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirming that the trust's safeguarding arrangements reflect or consider the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensuring that staff in academies read at least part one of KCSIE and the Child Protection and Safeguarding policy.
- Ensuring that mechanisms are in place to assist staff in academies to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensuring academies within the trust appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Ensuring academies within the trust appoint one or more DDSLs to provide support to the DSL, and ensuring that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Ensuring each academy within the trust facilitates a whole-academy approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern within an academy that is part of the trust, ensuring there are procedures in place to take the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensuring systems are in place within the trust for children and young people to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensuring that procedures are in place within the trust so that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensuring that a member of the local governing board for each academy within the trust is nominated to liaise with the academy's LA and/or partner agencies on issues

of child protection and in the event of allegations of abuse made against the principal or another governor.

- Ensuring all relevant persons are aware of the trust's safeguarding arrangements, including the board of trustees itself, and each academy's DSL, DDSL(s) and SLT.
- Making sure that children and young people in each academy are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the trust, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff within the trust are appropriately trained to support children and young people to be themselves at academy, e.g. if they are LGBTQ+.
- Ensuring each academy within the trust has clear systems and processes in place for identifying possible mental health problems in children and young people, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensuring that volunteers within the trust are appropriately supervised.
- Ensuring that at least one person on any appointment panel within the trust has undertaken safer recruitment training.
- Ensuring that all members, trustees and local governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Ensuring that all staff within the trust receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Certifying that there are procedures in place within the trust to handle allegations against staff, supply staff, volunteers and contractors.
- Confirming that there are procedures in place within the trust to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Ensuring that there are procedures in place within the trust to handle children and young peoples' allegations against their peers.
- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of children and young people, and staff within the trust.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the trust.
- Ensuring that there are systems in place for children and young people to express their views and give feedback within the trust.
- Establishing an early help procedure and ensure all staff within the trust understand the procedure and their role in it.
- Appointing a designated teacher for LAC and PLAC within each academy to promote the educational achievement of LAC and PLAC, and ensure that this person has undergone appropriate training.

- Ensuring that the designated teacher for LAC and PLAC within each academy works with the virtual academy head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Ensuring that staff members within the trust have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the child or young person's legal status, contact details and care arrangements.
- Ensuring the trust has put in place appropriate safeguarding responses for children and young people who go missing from an academy within the trust, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and preventing the risk of their disappearance in future.
- Ensuring that all members of the board of trustees and local governing bodies have been subject to an enhanced DBS check and that Section 128 prohibition checks have been carried out.
- Creating a culture within the trust where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept in each academy and the effectiveness of recordkeeping is monitored.
- Being aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

The safeguarding network (which comprises the safeguarding champion of the board of trustees as well as each Academy Committee, and the Director of Safeguarding and SEND) is responsible for:

- Any responsibilities delegated to it by the board of trustees.
- Investigating any activity within its terms of reference.

The designated safeguarding trustee is responsible for:

- Undertaking any responsibilities delegated to them by the board of trustees.
- Liaising with the safeguarding champion in each academy on an agreed basis regarding safeguarding matters.
- Taking leadership responsibility for safeguarding arrangements within the trust.
- Ensuring that accurate and effective recordkeeping of concerns and incidents is in place.

The Academy Committee of each academy is responsible for:

- Receiving regular reports from the DSL on safeguarding.
- Nominating a member to liaise with the academy's LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the principal or another governor.
- Ensuring that there are effective and appropriate policies and procedures in place in the academy.
- Ensuring that children and young people in each academy are taught about safeguarding, including protection against dangers online (including when they are

online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

- Adhering to statutory responsibilities by ensuring pre-employment checks are conducted on all staff within the academy, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensuring that staff are appropriately trained to support children and young people to be themselves at academy, e.g. if they are LGBTQ+.
- Ensuring that the academy has clear systems and processes in place for identifying possible mental health problems in children and young people, including clear routes to escalate concerns and clear referral and accountability systems.
- Ensuring that volunteers are appropriately supervised.
- Ensuring that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all local governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Ensuring that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensuring that there are procedures in place within the academy to handle children and young peoples' allegations against their peers.
- Ensuring that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of children and young people, and staff within the academy.
- Ensuring that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child and teenage relationship abuse within the academy.
- Ensuring that there are systems in place for children and young people to express their views and give feedback within the academy.
- Establishing an early help procedure and ensure all staff understand the procedure and their role in it.
- Appointing a designated teacher for LAC and PLAC to promote the educational achievement of LAC and PLAC, and ensure that this person has undergone appropriate training.
- Ensuring that the designated teacher for LAC and PLAC in the academy works with the virtual academy head(s) (VSH) to discuss how the pupil premium funding can best be used to support LAC and PLAC.
- Making sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the child or young person's legal status, contact details and care arrangements.
- Creating a culture within the academy where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that robust safeguarding records are kept and the effectiveness of recordkeeping is monitored.
- Being aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

The Director of Safeguarding and SEND is responsible for:

- Taking leadership responsibility for safeguarding arrangements within the trust.
- Auditing the safeguarding practice of each academy at least once per year.
- Reporting to the board of trustees about the safeguarding audits completed across the trust.
- Sharing the strategic leadership responsibility for the trust's safeguarding arrangements with the board of trustees.
- Facilitating training opportunities trust-wide to ensure consistency in the level of training and expertise in safeguarding across the board of trustees and local governing bodies.
- Ensuring that all trustees receive appropriate safeguarding and child protection training upon induction into the role, and that this training is updated regularly thereafter.
- Understanding the local criteria for action and the local protocol for assessment for each academy within the trust, and ensuring these are reflected in the trust's policies and procedures.
- Ensuring each academy within the trust facilitates a whole-academy approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Monitoring that the policies, procedures and training opportunities in the academies within the trust are effective and comply with the law at all times and that they are 'lived' policies.
- Monitoring that each academy within the trust contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Ensuring that the trust's safeguarding arrangements take into account the procedures and practices of the relevant LAs as part of the inter-agency safeguarding procedures.
- Ensuring systems are in place within the trust for children and young people to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Monitoring to ensure that children and young people in each academy are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Monitoring the impact of appropriate disciplinary procedures that are put in place, as well as policies pertaining to the behaviour of children and young people, and staff within the trust.
- Coordinating the induction of any new DSLs in the trust.
- Supporting with the induction of any new DDSs in the trust.
- Liaising with the board of trustees on an agreed basis with regards to safeguarding matters.
- Liaising with the DSL in each academy at least half-termly regarding safeguarding matters.
- Making referrals to the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child from any of the core member academies.

All staff within the trust and its academies have a responsibility to:

- Consider, at all times, what is in the best interests of the children and young people in the trust.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide safe environments in which children and young people can learn.
- Be prepared to identify children and young people who may benefit from early help.
- Be aware of the trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Read and understand the Child Protection and Safeguarding Policy, Part 1 of KCSIE 2024, the behaviour policy, the student attendance and absence policy and the staff code of conduct.
- Be aware of the role and identity of the DSL and DDSL(s) within the relevant academy.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Ensure that any safeguarding concern (no matter how minor it could be perceived to be) is reported via MyConcern* in detail and that the actions taken are recorded at the point of submitting the concern to the DSL and the DDSL(s) within the relevant academy.
- Ensure that where a concern is a matter of child protection, namely that the child is at risk of harm, or has suffered harm, this is reported immediately to the DSL or a DDSL in advance of the written submission via MyConcern*.
- Ensure that, even when another member of staff has observed, heard or witnessed the same concern, the concern is reported via MyConcern*.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant academy.
- Be aware of and understand the trust's procedure to follow in the event that a child or young person confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their academy's DSL or DDSL(s) if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put children and young people at risk of harm.

- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that children or young people may be at risk of harm.
- Monitoring the effectiveness of recordkeeping about safeguarding, child protection, behaviour and SEND matters.
- Be aware of the overlap between behaviour and safeguarding issues that can put children and young people at risk of harm.
- Be aware that a child may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Read the DfE Data Protection guidance for schools (DfE, 2024b), as per the recommendations in KCSIE.

All teachers within the trust, including principals, have a responsibility to:

- Safeguard children and young people's wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Report, by law, any instances of FGM to the police.
- Adhere to the guidance that a child or young person may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.

Principals in each academy throughout the trust have a duty to:

- Ensure that the policies and procedures adopted by the trust, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff within the trust with the appropriate policies and information upon induction (including those who join the academy part way through the academic year).
- **Ensure that all recruitment (including of volunteers) is done in accordance with the safer recruitment policy and that the SCR is always an accurate record.**
- Ensure all staff receive annual safeguarding training.
- Provide line management to the DSL.
- Ensure that the DSL and at least one DDSL is able to attend all trust-wide DSL networks.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.

DSLs, within their own academies, have a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety (including filtering and monitoring).
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Work with the board of trustees or delegated authority to ensure the Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.

- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during academy hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the academy, adequate and appropriate cover for any activities outside of academy hours or terms.
- Refer cases:
 - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the principal to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the designated mental health lead and, where available, the mental health support team and / or CAMHS, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at academy. This includes:
 - Ensuring that all staff in the academy are aware of which children have or have had a social worker.
 - Understanding the academic progress and attainment of these children.
 - Maintaining a culture of high aspirations for these children.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these children realise their potential and their God-given talents and gifts.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these children are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.

- Ensure that child protection files are transferred as soon as possible, and in any case within five days, when transferring to a new academy, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Ensure the Child Protection and Safeguarding Policy is available publicly, and parents are aware that the academy may make referrals for suspected cases of abuse or neglect (ideally with parental consent), as well as the role the academy plays in these referrals.
- Ensure that all concerns (whether they occurred in school, on line or in the community) must be acted upon by school.
- Ensure that the school makes referrals to the police about potential criminal activity or about children who are missing – they will not rely on parents or carers to make such reports.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Ensure that all DDSLs undergo training and update this training at least every two years
- Ensure that all staff receive and engage with quality briefings and updates about safeguarding and child protection throughout the academic year
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties children and young people may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within academy, with other academies, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.
- Engage with the trust-wide professional learning networks for safeguarding colleagues.
- Complete the local Section 175 audit for the local authority, and share this with the Director of Safeguarding and SEND in advance of submitting it to the local authority
- Engage with all Trust audit processes in relation to safeguarding, behaviour and attendance

- Ensure that all cases recorded in MyConcern are actioned in a timely manner and monitored for progress towards improved outcomes for children
- Ensure that as well as quality assuring that there is a high quality record of all concerns, discussions and decisions that a record of the rationale for any decisions is also included in records kept about safeguarding concerns.
- Ensure that any early years practitioners (and any child or young people engaging in placements in early years settings) are trained appropriately in the safeguarding of children.
- Ensuring that staff seek to understand the views of children and young people and their families.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Sexual harassment and child-on-child abuse

Sexual harassment

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of a academy environment. Sexual harassment is likely to violate a child or young person’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

Upskirting

For the purposes of this policy, “**upskirting**” refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or

alarm. Upskirting is a criminal offence. Anyone, including children or young people, and staff, of any gender can be a victim of upskirting.

Upskirting and sexual harassment will not be tolerated within the trust or any of its academies. Children and young people across the trust's academies will be allowed an open forum to talk about concerns and sexual behaviour. They will be taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled. Reports of upskirting and sexual harassment will be managed at **academy** level in line with the academy's own Child-on-child Abuse Policy.

The curriculum will ensure that children and young people of all ages are taught about and understand the concept of consent and its importance in an age-appropriate way.

Youth-produced sexual imagery and indecent imagery

For the purposes of this policy, the “**consensual and non-consensual sharing of nude and semi-nude images and/or videos**”, colloquially known as “**sexting**”, is defined as the sharing between children and young people of sexually explicit content, including indecent imagery. For the purposes of this policy, “**indecent imagery**” is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

The sharing of consensual and non-consensual nude or semi-nude images or videos will not be tolerated within the trust or any of its academies. Children and young people across the trust's academies will be allowed an open forum to talk about their concerns regarding sexual imagery. They will be taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled. Reports of youth-produced sexual imagery will be managed at **academy** level in line with the Youth-produced Sexual Imagery (YPSI) Policy from their LA. Indecent imagery that is not youth-produced sexual imagery will be managed at **academy** level in line with the Child Protection and Safeguarding Policy.

Multi-agency working

The trust contributes to multi-agency working as part of its statutory duty. The trust is aware of, and will follow, the local safeguarding arrangements.

The academies within the trust will be fully engaged, involved, and included in local safeguarding arrangements. Once the trust and its academies are named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. Academies within the trust will act in accordance with the trust's safeguarding arrangements.

The trust will work with CSCS, the police, health services and other services to protect the welfare of its children and young people, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the academies within the trust will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The trust also recognises the particular importance of inter-agency working in identifying and preventing CSE and CCE.

Information sharing

The trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet children and young people's needs and identify any need for early help.

Considering the above, staff within the trust will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on educational settings to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the child and young person being placed at risk of harm.

Staff members within the trust and its academies will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children and young people. If academy staff members are in doubt about sharing information, they will speak to their academy's DSL or DDSL(s). If a DSL or DDSL is unsure about sharing information, they will speak to the Director of Safeguarding and SEND.

Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any child or young person may benefit from early help, but in particular, staff within the trust will be alert to the potential need for early help for children and young people who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from education, care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have experienced multiple suspensions, is at risk of being permanently excluded from school and in alternative provision or a pupil referral unit.
- Have a parent or carer in custody, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.

- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or child marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the academy day.
- Show early signs of abuse and/or neglect in other ways.

The DDSL in the academy will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required. The DDSL will report to the DSL about the progress of any children or young people who are open to early help support. The DSL will report about the number of families engaging with early help to the AC.

Staff within the trust may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the children and young people situation is not improving or is worsening.

Abuse, neglect and exploitation

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of children or young people which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children or young people may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children or young people may be abused by one or multiple adults or other children or young people.

All staff will be aware that the definition of abuse’ is clear that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children **see, hear or experience** domestic abuse and its effects.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or young person. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child or young person.

For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child or young person such as to cause severe and adverse effects on the child or young person’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child or young person the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children or young people, such as interactions that are beyond their

developmental capability, overprotection and limitation of exploration and learning, or preventing the child or young person from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child or young person to frequently feel frightened or in danger, or the exploitation or corruption of children or young people. Some level of emotional abuse is involved in all types of maltreatment of a child or young person, but it may also occur alone.

For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, and regardless of whether the child or young person is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children or young people in looking at, or in the production of, sexual images, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child or young person’s basic physical and/or psychological needs, likely to result in serious impairment of a child or young person’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child or young person from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or young person’s basic emotional needs.

All staff will be aware of the indicators of abuse, neglect and exploitation and understand that children and young people can be at risk of harm inside and outside of the academy, inside and outside of home, as well as online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children and young people outside of these environments; this includes being aware that children and young people can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a child or young person being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Specific safeguarding issues

There are certain specific safeguarding issues that can put children and young people at risk of harm – staff will be aware of these issues.

Appendix 1 of this policy sets out details about specific safeguarding issues that children and young people may experience and outlines specific actions that would be taken in relation to individual issues.

Child-on-child abuse

For the purposes of this policy, “**child-on-child abuse**” is defined as abuse between children and young people.

All staff will be aware that child-on-child abuse can occur between children and young people of any age and gender, both inside and outside of academy, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse. Three Spires Trust academies have anti-bullying and behaviour policies to guide, inform and support children, young people and staff, as well as parents and carers.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”. All staff will challenge behaviours (which may potentially be criminal in nature), such as physical and sexual assaults, i.e. grabbing bottoms, breasts and genitalia, flicking bras, lifting skirts and “dropping” trousers or shorts.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting and downblousing, and ‘kegging’.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it. All staff are clear that this child protection and safeguarding policy must be followed in order to prevent any concerns from escalating. This is in addition to the behaviour policy.

Children and young people will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Children and young people will also be reassured that they will be taken seriously, be supported, and kept safe. The initial response and timeliness of action from the moment a report is received from a child is crucial. The opportunity to intervene must not be missed. No child or young person should ever feel ashamed for making such a report. All victims will be taken seriously, regardless of the nature of the report. Abuse that occurs online or outside of school will not be minimised or downplayed – it will be treated equally seriously. We will ensure that children and young people know that the law is in place to protect them rather than criminalise them and this will be explained in such a way that prevents alarming or distressing the child or young person.

Victims of child-on-child abuse will be supported by the pastoral systems in the academy with referrals to specialist agencies, if appropriate. Risk assessment and / or safety planning are an integral part of this support plan, particularly regarding post-incident management.

A confidential chat service for young people with concerns about their own or others' sexual thoughts and behaviours is available at shorespace.org.uk

Online safety and personal electronic devices

As part of a broad and balanced curriculum, all children and young people will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Children and young people's attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a child and young person's online activity.

The academy will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the academy's Data and Cyber-security Breach Prevention and Management Plan. The academy will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what children and young people can be taught online.

Staff **must** be aware of the filtering systems in place and will know how to escalate concerns where they are identified.

Staff will ensure that they are alert to the safeguarding risks posed by misinformation, disinformation (fake news) and conspiracy theories. F

Further information regarding the academy's approach to online safety can be found in the Online Safety Policy. **All staff are expected to read this policy.**

Communicating with parents and carers

As part of the usual communication with parents and carers, the academy will reinforce the importance of children and young people being safe online and inform parents and carers that

they will find it helpful to understand what systems the academy uses to filter and monitor online use.

Reviewing online safety

The academy will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by children and young people.

Personal electronic devices

The use of personal electronic devices is governed by the behaviour policy and the staff code of conduct.

Photographs and videos of children

Photographs and videos of children and young people will be carefully planned before any activity with particular regard to consent and adhering to the academy's Data Protection Policy and Photography Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve children and young people who are LAC, adopted, or children or young people for whom there are security concerns, the principal will liaise with the DSL to determine the steps involved. The DSL will, in known cases of children who are LAC or who have been adopted, liaise with the children or young people's social workers, carers or adoptive parents to assess the needs and risks associated with the children and young people

Staff will report any concerns about children and young people's or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "**Operating equipment**" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the academy. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

Children who are missing from education

A child is absent from an academy within the trust is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.

Staff within the trust will monitor children and young people that go missing from the academy, particularly on repeat occasions, and report them to their academy's DSL following normal safeguarding procedures, in accordance with the Children Missing from Education Policy.

The academy will inform the LA and the trust of any child or young person who fails to attend regularly or has been absent without the academy's permission for a period of 10 academy days or more.

Child abduction and community safety incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

The board of trustees will ensure that information about community safety incidents is shared across all academies in the trust, especially those in close geographic proximity to one another.

Joint solutions and strategies will be implemented where a community safety incident impacts children and young people at more than one academy within the trust.

Children and young people will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

In order to reduce the risk of community safety incidents, DSLs will complete a ‘contextual safeguarding risk reduction analysis’ in September each year; this document will be shared with their link champion for safeguarding, the Director for Safeguarding and SEND and the board of trustees.

Modern slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff within the trust will be aware of and alert to the signs that a child or young person may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

The trust ensures that teachers within its academies are aware they are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on any child under the age of 18. Teachers failing to report such cases may face disciplinary and criminal action.

Radicalisation

For the purposes of this policy:

- “Extremism” is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- “Radicalisation” is the process of a person legitimising support for, or use of, terrorist violence.
- “Terrorism” is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children and young people’s behaviour which could indicate that they may be in need of help or protection.

Children and young people at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following - there is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

The school will be sensitive to age and learning appropriate behaviour, though example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- Attempts to recruit others to the group/cause/ideology;
- Communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others.

Protecting children from the risk of radicalisation is part of the wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The trust will ensure that academies engage with parents, carers and families on the matter, as they are in a key position to spot signs of radicalisation. In doing so, the trust will assist and advise academies in which family members raise concerns and provide information for support mechanisms.

The trust aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The school is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all academies within the trust are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. The Prevent duty forms part of the trust's wider safeguarding obligations.

The trust's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in academy-level Prevent Duty Policies.

Of note, in the event that a child or young person is visited by a police officer in their educational setting, they **will** always be accompanied by either the DSL or a deputy DSL, **without exception**.

Mental health

All staff within the trust will be made aware that mental health problems can, in some cases, be an indicator that a child or young person has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff within the trust will not attempt to make a diagnosis of mental health problems and academies will ensure this is done by a trained mental health professional. Staff within all academies will, however, be encouraged to identify children and young people whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. The trust will ensure that staff are also made aware of how children and young people's experiences can impact on their mental health, behaviour, and education.

Staff within the trust and its academies who have a mental health concern about a child or young person that is also a safeguarding concern are encouraged by the trust to act in line with this policy and speak to the DSL or DDSL(s).

The trust will ensure its academies can access a range of advice to help staff members identify children and young people in need of additional mental health support, including working with external agencies. It will also ensure that there is a wide variety of advice and support offered to its academies while ensuring an ethos that is positive towards being open about mental health is adopted and implemented in each academy.

In all cases of mental health difficulties, academies' Social, Emotional and Mental Health (SEMH) Policies will be consulted and adhered to at all times.

Consensual and non-consensual sharing of indecent images and videos

All academies within the trust will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff within the trust will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the child and young person, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the academy community, including understanding motivations, assessing risks posed to children and young people depicted in the images, and how and when to report instances of this behaviour.

Staff within the trust will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that children are not unnecessarily criminalised.

Where a member of staff within the trust becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the academy's DSL as soon as possible. Where a child confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Inform the academy's DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the child or young person that the incident will need to be reported.

- Respond positively to the child or young person without blaming or shaming anyone involved, and reassuring them that they can receive support from the academy's DSL.

The trust's full response to incidents of consensual and non-consensual sharing of indecent images and videos can be found in the Youth-produced Sexual Imagery (YPSI) Policy.

Of note, in the event that a child or young person is visited by a police officer in their educational setting, they **will** always be accompanied by either the DSL or a deputy DSL, **without exception**.

Context of safeguarding incidents

Safeguarding incidents can occur outside of academies within the trust and can be associated with outside factors. All staff, particularly DSLs and DDSL(s), will always consider the context of safeguarding incidents. Assessment of children and young people's behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The academies within the trust will provide as much contextual information as possible when making referrals to CSCS.

Children and young people who are potentially more susceptible to harm

Each academy within the trust recognises that some groups of children can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of children and young people. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Children or young people who need social workers

Children or young people may need social workers due to safeguarding or welfare needs. These needs can leave children vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL within each academy will hold and use information from their LA about whether a child or young person has a social worker in order to make decisions in the best interests of the child or young person's safety, welfare, and educational outcomes.

Where a child or young person needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents and carers may choose elective home education (EHE) for their children and young people. In some cases, EHE can mean that children and young people are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, each academy within the trust will ensure it informs their LA of all deletions from the admissions register when a children and young people is taken off roll.

Where a parent or carer has expressed their intention to remove a child from an academy within the trust for EHE, the academy, in collaboration with the trust, LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the child or young person has SEND, is vulnerable, and/or has a social worker. Where the child or young person has an EHCP, the academy will always seek to convene a meeting with the family and the LA keyworker. Where a parent or carer intends to educate their child at home, the school must be formally notified in writing of this decision, making clear that the family will carry out their duties and the date from which their decision is effective.

Where a parent or carer notifies of the intention to educate their child at home, the DSL will notify the Trust Director of Safeguarding and SEND without delay.

LAC and PLAC

Children and young people most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously LAC (PLAC), also known as care leavers, can also remain vulnerable after leaving care.

The board of trustees will ensure that staff in the trust have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the child.

The DSL in each academy will be provided with the necessary details of children and young people's social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in each academy's LAC Policy.

Children and young people with SEND

When managing safeguarding in relation to children and young people with SEND, staff within the trust and its academies will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the child and young person's disability; however, it should never be assumed that a child or young person's indicators relate only to their disability
- Children and young people with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for children and young people with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue

relating to a child or young person with SEND, the DSL in the academy will liaise with the academy's SENCO, as well as the child or young person's parents where appropriate, to ensure that the child or young person's needs are met effectively.

LGBTQ+ children and young people

The fact that a child or young person may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ children and young people can be targeted by other individuals. Staff within the trust will also be aware that, in some cases, a child or young person who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as children or young people who identify as LGBTQ+.

Staff within the trust will also be aware that the risks to these children and young people can be compounded when they do not have a trusted adult with whom they can speak openly with. All staff will endeavour to reduce the additional barriers faced by these children and young people and provide a safe space for them to speak out and share any concerns they have.

Use of academy premises for non-academy activities

Where an academy within the trust hires or rents out facilities or premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep children and young people safe, including seeking approval from the board of trustees, where required.

Where an academy within the trust provides the activities under the direct supervision or management of academy staff, child protection arrangements will apply.

Where activities are provided separately by another body, this may not be the case; therefore, the board of trustees or delegated authority will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

The board of trustees or delegated authority will also ensure that there are arrangements in place to liaise with academies within the trust on these matters where appropriate. The board of trustees or its delegated authority will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement. Academies must comply with the trust-wide lettings policy.

Extra-curricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the academies in the trust to effectively safeguard children and young people and adhere to local and trust-wide safeguarding arrangements.

Staff and volunteers running extra-curricular activities and clubs should be aware of their safeguarding responsibilities and promote the welfare of children and young people. Paid and volunteer staff should understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Alternative provision

The academy will remain responsible for a child or young person's welfare and their safeguarding during their time at an alternative provider. When placing a child and young person with an alternative provider, the academy will follow the trust-wide Alternative Provision policy. **This Policy outlines in detail about how Three Spires Trust quality assures the safeguarding and the quality of education of all children on our roll.**

Work experience

When a child or young person is sent on work experience, the academy will ensure that the provider has appropriate safeguarding policies and procedures in place. **The academy remains responsible for a child or young person's welfare during their time at a provider. This responsibility includes monitoring of attendance and involvement in management of safeguarding concerns where appropriate.**

Where the academy has children and young people conduct work experience at the academy, an enhanced DBS check will be obtained if the young person is over the age of 16 and is not on roll at an academy within the trust.

Homestay exchange visits

Academy-arranged homestays in UK

Where the academy is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the academy is the regulated activity provider; therefore, the academy will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the academy will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the academy will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

Academy-arranged homestays abroad

The academy will liaise with partner academies to discuss and agree the arrangements in place for the visit. The academy will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The academy will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Children and

young people will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or child or young person arranges their own homestay, this is a private arrangement and the academy is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the academy becomes aware of a child or young person being privately fostered, the DSL will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

Concerns about children and young people

The trust will approve and continuously monitor the procedures within each academy for reporting concerns about children or young people's welfare. Monitoring visits will be conducted by the Director for Safeguarding and SEND at least annually and will assess whether each academy:

- Has clear procedures for staff to report concerns to their DSL.
- Has clear procedures for their DSL to make referrals to their LA.
- Has trained its staff members to understand their responsibilities in these procedures.
- Has ensured all staff are aware of their obligations in relation to confidentiality and information sharing.

Staff within the trust will be aware that children and young people may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. All staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a child or young person.

The trust recognises that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. The trust is conscious of this when managing any incident and be prepared to use any term with which the individual is most comfortable.

The trust adopts a zero-tolerance approach to child-on-child abuse, which is defined as abuse between children under the age of 18.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSLs with the matter. If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the child. If the

situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the child.

If early help is appropriate, the case will be kept under constant review. If the child's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in MyConcern¹.

If a child is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a child has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the academy will ensure that the child or young person's wishes are always taken into account, and that there are systems available for children to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the child or young person feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Process Flowchart will be followed accordingly.

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the children involved. The DSL will work closely with the police to ensure the academy does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Whilst it is acknowledged that the DSL or their deputy/ies are best placed to make a referral to CSCS, it is important that every adult in the academy community is aware that they are able to make a referral and the referral routes to the local authority safeguarding and child

¹ All schools who joined the Trust before 31 January 2024 use MyConcern. Hanley St Luke's use CPOMS. Where this policy reference CPOMS, Hanley St Luke's staff and parents should replace this with CPOMS. This is an interim arrangement with exit planning in place. Training is provided in all academies for the correct system for their setting. All other practices are identical across the organisation.

protection teams. As part of the annual training, all adults are made aware of these referral routes; the contact details are included at the beginning of this policy.

Where a child has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken as soon as possible after a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The academy will not wait for the start or outcome of an investigation before protecting the victim and other children and young people: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the academy will consider referring the incident again if it is believed that the child is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the academy agrees with this decision, the academy will consider the use of other support mechanisms, such as early help and pastoral support. If the academy does not agree with the CSCS decision, then the DSL, with the support for the Director of Safeguarding and SEND will escalate using the local safeguarding board policy and procedures.

At all stages of the reporting and referral process, the child or young person will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents and carers will only take place where this would not put the child or others at potential risk of harm. The academy will work closely with parents and carers to ensure that the child or young person, as well as their family, understands the arrangements in place, such as in-academy interventions, is effectively supported, and knows where they can access additional support.

Concerns about staff and safeguarding practices

If a staff member in an academy within the trust has concerns about another member of staff (including supply staff and volunteers), it will be raised with the principal of that academy. If the concern is with regards to a principal within the trust, it will be referred to the chair of trustees.

Any concerns regarding the safeguarding practices at the trust will be raised with the SLT of the academy and the Director of Safeguarding and SEND. If the member of staff feels unable to raise the issue with the appropriate staff, the necessary whistleblowing procedures will be followed, as outlined in the trust-wide Whistleblowing Policy. If a staff member feels unable to raise an issue following any of these routes, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285) or Ofsted. .

Allegations of abuse against staff

All allegations against academy staff, trust staff, supply staff, volunteers and contractors will be managed in line with the relevant Allegations of Abuse Against Staff (including low level concerns) Policy and the procedures laid out by the individual academy at which the staff members work or have worked. The trust will ensure its academies are equipped to manage all allegations against staff, including those who are not employees of academies within the trust, and that the affected academies liaise with the relevant parties.

When managing allegations against staff, the trust will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”.

Allegations that meet the harms threshold include instances where staff have:

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

Where a member of staff recognises that they have behaved in a way which may have harmed a child or breached the staff code of conduct, they must self-refer to the principal.

Any referrals about members of staff must go directly to the principal of the academy (where a member of staff is employed as part of the central team, this must go directly to the CEO). Where the concern is about a principal, it must be reported to the Chair of Governors, the CEO or the Director of Safeguarding and SEND. Where the concern is about the CEO, it must be reported to the Chair of the Trust Board. In the absence of a Principal or Chair of Governors, concerns must be alerted to the Director of Safeguarding and SEND.

Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the data protection policies of the trust and individual academies within the trust.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the trust and affected academies will consult its relevant policies and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the trust and its academies will do all it can to protect the anonymity of the children involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a child or young person, staff members will not promise the child or young person confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects children from harm, information can be lawfully shared without the victim’s consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL of the academy will weigh the victim’s wishes against their duty to protect the victim and others. Where a referral is made against

the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL of the academy will discuss the concern with the parents or carers of the children or young people involved. Discussions with parents or carers will not take place where they could potentially put a child or young person at risk of harm. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the trust will ensure the appropriate disciplinary procedures are implemented as necessary and will analyse how damage can be minimised and future breaches be prevented.

Safer recruitment

The trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the academy at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

The board of trustees will conduct the appropriate pre-employment checks for all prospective trust employees, including internal candidates and candidates who have lived or worked outside the UK. This responsibility may be delegated by the board of trustees as required.

The appropriate DBS and suitability checks will be carried out for all members, trustees, local governors, volunteers, and contractors within the trust.

The chair of trustees will undertake a suitability check by the ESFA and an enhanced DBS check that will be carried out regardless of checks previously performed by other organisations or how recently these took place.

Staff suitability

All settings that provide care for children under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form (Appendix 2) confirming that they are not disqualified from working in an education setting. A disqualified

person will not be permitted to continue working at the academy, unless they apply for and are granted a waiver from Ofsted. The academy will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk. The trust-wide SCR and DBS policies offer further on timescales in relation to this matter. All staff will make sign a declaration about their ongoing suitability for work at the start of an academic year.

Referral to the DBS

The trust will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Training

Staff members will undergo safeguarding and child protection training at induction (including when they join the trust partway through the year), which will be updated at least termly and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE).
- The Behaviour Policy.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSLs.
- Information about the role and identity of the Director of Safeguarding and SEND.
- Information about the roles and identities of the local safeguarding champion for safeguarding and the trustee with responsibility for safeguarding.
- Information about how staff can protect themselves and the organisation against cyber-crime
- How to use MyConcern in order to record any concern and the actions taken.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- Exploitation and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the academy and within the trust.

The DSL, deputy DSLs, DTLAC, and Principal will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, children with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by children and young people with SEND.

Monitoring and review

This policy is reviewed at least annually by the Director of Safeguarding and SEND and the board of trustees. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of the trust. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme and their ongoing safeguarding training.

The next scheduled review date for this policy is August 2026.

Appendix 1: Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that children and young people may experience and outlines specific actions that would be taken in relation to individual issues.

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The academy will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children **missing and absent from education**

A child going missing from their academy, or a child who has unexplainable and / or persistent absences is potentially susceptible to abuse, neglect or exploitation and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor children and young people that go missing from the academy, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing and Children Absent from Education Policy.

Knowing where children are during school hours is an extremely important aspect of safeguarding.

Children's repeated or prolonged absence from school can be an indicator of abuse, neglect and / or exploitation. We monitor attendance carefully and address poor and / or irregular attendance without delay. Current allocated social workers must be consulted on any issues in relation to attendance for the children that they are supporting, including immediate notification when the child is absent from education.

As part of our monitoring procedures, schools must always follow up with parents or carers when children are absent from school.

Admissions register

Children and young people are placed on the admissions register at the beginning of the first day that is agreed by the academy, or when the academy has been notified that the child or young person will first be attending. The academy will notify the LA within 5 days of when a child's name is added to the admissions register.

The academy will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents and carers when any changes occur. Two emergency contacts will be held for each child or young person where possible. Staff will monitor children and young people who do not attend the academy on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the academy that their child will live at a different address, the academy will record the following information on the admissions register:

- The full name of the parent(s) or carer(s) with whom the child will live
- The new address
- The date from when the child or young person will live at that address

If a parent or carer notifies the academy that their child will be attending a different academy, or is already registered at a different academy or academy, **the child's entry on the admissions**

register will be removed immediately, and the following information will be recorded on the admissions register:

- The name of the new setting
- The date on which the child or young person first attended, or is due to attend, that setting

Where a child or young person moves to a new setting, the academy will use a secure internet system to securely transfer children or young people's data.

To ensure accurate data is collected to allow effective safeguarding, the academy will inform the LA of any child or young person who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the academy by their parents or carers, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the academy, and no longer live within a reasonable distance of the premises.
- Have been certified by the LA's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the child or young person continuing to attend academy after ceasing to be of compulsory academy age.
- Have been in custody for a period of more than four months due to a final court order and the academy does not reasonably believe they will be returning to the academy at the end of that period.
- Have been permanently excluded.

The academy will also remove a child or young person from the admissions register where the academy and LA has been unable to establish the child or young person's whereabouts after making reasonable enquiries into their attendance.

If a child or young person is to be removed from the admissions register, the academy will provide the LA with the following information:

- The full name of the child or young person
- The full name and address of any parent or carer with whom the child or young person lives
- At least one telephone number of the parent or carer with whom the child lives
- The full name and address of the parent or carer with whom the child or young person is going to live, and the date that the child or young person will start living there, if applicable
- The name of the child or young person's new academy and the child or young person's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The academy will work with the LA to establish methods of making returns for the child or young person back into the academy. The academy will highlight to the LA where they have

been unable to obtain necessary information from parents, e.g. where an address is unknown. The academy will also highlight any other necessary contextual information, including safeguarding concerns.

Where a child or young person is removed from the admissions register, the Principal will authorise the grounds for removal before the child or young person is formally removed from the admissions register.

Elective Home Education

Where a parent/carer has expressed their intention to Electively Home Educate their child, the local authority, school, and other key professionals should work together to coordinate a meeting with parents/carers and carers where possible, to discuss what support can be put into place to either support the child to remain in school or to discuss next steps.

This meeting will ensure that parents and carers have considered what is in the best interests of each child. KSCIE emphasises that this is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

This meeting and any documentation relating to the request for Elective Home Education must be recorded in MyConcern.

Child abduction and community safety incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child or young person from a parent or anyone with legal responsibility for that child or young person. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the academy that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with children or young people.

Children and young people will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The academy will recognise that children involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The academy will also recognise that children of any gender are at risk of CCE.

Academy staff will be aware of the indicators that a child is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing academy or education or not taking part.

County lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, academy staff will be aware of the specific indicators that a child or young person may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owning a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of children with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a child or young person may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring children or young people to the National Crime Agency’s Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, “**child sexual exploitation**” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The academy will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the child’s immediate knowledge, e.g. through others sharing videos or images of them on social media. The academy will recognise that CSE can affect any children and young people who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes children and young people aged 16 and above who can legally consent to sexual activity. The academy will also recognise that children and young people may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

Academy staff will be aware of the key indicators that a children and young people is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.

- Regularly missing academy or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The academy will cooperate as needed.

Modern slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a child or young person may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

All staff will be alert to the possibility of a child or young person being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The academy’s procedures relating to managing cases of FGM and protecting children and young people will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a child under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine children, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that children may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the child or young person. It is important to note that the child may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a child or young person may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The child or young person coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the child:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from academy, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of “**‘honour-based’ abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, ‘2-finger’ or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to

procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The academy will educate children and young people about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where children and young people feel safe enough to make a disclosure.

Children aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a child is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A child or young person is known to have requested either procedure or asks for help
- Family members disclose that the child or young person has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the child or young person is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A child or young person has already experienced or is at risk of other forms of HBA
- A child or young person is already known to social services in relation to other safeguarding issues
- A child or young person discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A child or young person displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour

- A child or young person appears fearful of their family or a particular family member
- Unexplained absence from academy, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in the quality of work, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The academy will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the child or young person, including expediting arrangements for the procedure.

Child marriage

Child marriage is a marriage where one of both spouses are not of legal age to marry in the UK. Child marriage can include physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.

All staff will be alert to the indicators that a child or young person is at risk of, or has undergone, marriage, including, but not limited to, the child or young person:

- Being absent from academy – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming academy holidays.
- Being subjected to surveillance by family members at the academy.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from the academy by their parents or carers.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a child or young person who may have undergone, is currently undergoing, or is at risk of marriage will speak to the DSL or principal and local safeguarding procedures will be followed – this could include referral to CSCS, or the police.

The DSL or principal will ensure the child or young person is spoken to privately about these concerns and further action taken as appropriate. Children and young people will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the child or young person's family or those with influence in the community, without the express consent of the child or young person, as this will alert them to the concerns and may place them in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among children and young people.

If a child or young person is being forced to marry, or is fearful of being forced to, the academy will be especially vigilant for signs of mental health disorders and self-harm. The child or young person will be supported by the DSL and designated mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local safeguarding procedures will be activated following concerns regarding forced marriage – the academy will use existing national and local protocols for multi-agency liaison with police and CSCS.

The academy will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The academy will establish where possible whether children and young people at risk of marriage have a dual nationality or two passports.

The academy will aim to create an open environment where children feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The academy will take a whole academy approach towards educating on marriage in the curriculum and environment – in particular, the R(S)HE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to children and young people. Children and young people will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding child marriage and the signs to look out for.

Supporting Gender Questioning Pupils

At Three Spires Trust, we are committed to nurturing a safe, inclusive, and respectful environment where every child is valued and supported to flourish. We recognise that some pupils may question their gender identity. This is not, in itself, a safeguarding concern, but may be associated with wider vulnerabilities that require sensitive and proportionate support.

Our approach is rooted in compassion and care. Any requests for social transition—such as changes to name, pronouns, uniform, or access to facilities—will be considered thoughtfully and on a case-by-case basis. Decisions will be made in partnership with parents or carers wherever possible, unless doing so would place the child at risk of harm. We will always act in the best interests of the child, guided by our legal responsibilities and the principles of dignity, safety, and inclusion.

Staff are expected to respond with empathy and professionalism, seeking guidance from the DSL and senior leaders before taking any action. We acknowledge that social transition is not a neutral act and must be approached with care, as highlighted in the Cass Review. Our priority is to ensure that all pupils feel safe, respected, and supported.

Bullying, harassment, or discrimination of any kind—including on the basis of sex, gender identity, or perceived gender identity—will not be tolerated. We are committed to fostering a culture of kindness, understanding, and mutual respect across all our academies.

Children and young people with a **parent or other** family members in prison

Children and young people with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Children and young people required to give evidence in court

Children and young people required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Children and young people required to attend family court will be offered appropriate pastoral support. Children and young people required to attend a SEND Tribunal will be provided with appropriate pastoral support.

Primary-aged children will be provided with the booklet '[Going to Court](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Secondary-aged young people and sixth formers will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Serious violence

Through training, all staff will be made aware of the indicators which may signal a child is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from the academy.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a child or young person's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from their academy.
- Having been permanently excluded.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a child or young person may be vulnerable to, or involved in, must report this using the usual safeguarding referral systems.

Appendix 2: Recording of concerns in ‘MyConcern’

All concerns, no matter how “low level” they are perceived to be must be recorded and shared in a timely manner. Concerns about a child’s welfare, safety, change in behaviour and / or presentation, bullying, family circumstances etc must be shared in MyConcern.

Children’s names and names of adults (including staff) are to be recorded in full in all entries in order to avoid any confusion. Information that you write about your own actions are to be written in the first person, ie I spoke to Jack and he told me that ...; Mrs Ahmed reported to me about the matter and I told her that I would refer the matter to ...

Concerns are to be detailed – there is a guide to each of the entries included below:

CONCERN SUMMARY

Use up to 6 key words about the concern that you have

SEND CONCERN TO

Select the appropriate distribution group

CONCERN DATE / TIME

When did you become aware of the concern?

DETAILS OF CONCERN

In detail, explain what you are concerned about – why you are concerned about this – how did you come to have these concerns (hearsay, direct disclosure, marking of work, overhearing of things, observation etc. Write in the first person for your actions.

Ensure that all names are written in full (the names of children and the names of adults) as these records stand for many years and misinterpretation of information shared could leave a child vulnerable because of misidentification or a lack of understanding

Be clear about the difference between fact and opinion in all records

LOCATION OF INCIDENT

Select the most appropriate location from the drop-down list

ACTION TAKEN

Summarise the action that you have taken in order to either reassure, respond, reduce risk, refer etc following receipt or identification of risk or need as referred.

ATTACHMENT

If you have any attachments to add, please add them here with a sensible (meaningful) file name, ie “photo of work in book” or “letter written by NAME” or “photo of items confiscated”

Once the concern has been received by a DSL, it must be triaged without delay. Triage is about asking more and finding out more before passing it on to a more appropriate colleague (if applicable). The rationale for all decisions taken by the DSL, a DDSL, the DTLAC or the Principal must be documented in the record of the concern.