



Safeguarding and Child Protection Policy

All phases of education, ages 4-18

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I. Purpose of Policy

I.1 Policy Statement

Bohunt Education Trust (the Trust) has introduced this Policy to ensure its legal duties and charitable purposes are met effectively in this regard. The Trust recognises its responsibilities for safeguarding children and young people and protecting them from harm. The Trust promotes and instils a view where we **'assume it is happening here'**. Through all the provisions of this Policy, we operate a 'board to floor' approach to safeguarding and child protection whereby all staff are made aware of and take seriously, their responsibilities so that every precaution can be taken to minimise risk of harm to our students whilst they are in our Schools, when being educated off-site, and to the extent we can control, in their lives outside of our Schools.

This policy applies to the whole Trust community and all academies.

All agencies and individuals aim proactively to safeguard and promote the welfare of children and young people so that the need for action to protect children and young people from harm is reduced. The Trust is fully committed to delivering this in all its activity at all levels.

This policy applies to the whole Trust community and all academies.

2. Legislation and Guidance

This Policy complies with and discharges the Trust's legal duties with respect to:

- Keeping Children Safe in Education - Part 1 can be accessed in the full guidance document on this link: [Keeping children safe in education](#) (as updated annually)
- Working Together to Safeguard Children (as updated)
- DfE Governance Code March 2024
- What to do if you are Worried a Child is Being Abused - Advice for Practitioners (2015)
- Education Act (2002), and in line with government publications
- Education (Independent School Standards) Regulations 2014
- Human Rights Act 1998 (or any subsequent replacement of such Act)
- Statutory guidance on FGM
- The Children Act 1989 (and 2004 amendment)
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Statutory guidance on the Prevent duty
- The School Staffing (England) Regulations 2009
- DfE Non statutory guidance on Information Sharing for Safeguarding Practitioners (May 2024)
- Online Safety Act 2023
- Alternative Provision DfE statutory guidance
- Education for children with health needs who cannot attend school - GOV.UK (www.gov.uk) – DfE statutory guidance.

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

This policy also links to the BET Attendance Policy.

3. Key Definitions

CCE means Child Criminal Exploitation

Children means: all young people aged under 18. BET does not generally work with vulnerable adults (those over 18) unless they remain at School on roll as Year 13 or Year 14; in these situations this policy applies to those over 18 year olds on roll as if they are under 18

CP means Child Protection

CPC means Child Protection Conference

CIN means Child in Need

CPOMS means Child Protection On-line Monitoring System

CSE means Child Sexual Exploitation

DOSC means Designated Officer for Safeguarding Children

DSL means Designated Safeguarding Lead

DDOSC means Deputy Designated Officer for Safeguarding Children

FGC means Family Group Conference

EHA means Early Help Assessment

LAC means Looked After Children

LADO means Local Authority Designated Officer

MASH means Multi Agency Safeguarding Hub

MAT means Multi Agency Teams

(L)SCP means (Local) Safeguarding Children's Partnership

PSHCE means Personal Social Health and Citizenship Education

RCPC means Review Child Protection Conference

Family Help means local multi-agency support provided to children and families where needs are emerging or escalating but do not yet require statutory intervention, or where coordinated help is required to prevent harm or improve outcomes.

Self-generated intimate image or video means any intimate image or video created, shared or possessed by a child or young person, whether voluntarily, under pressure, through coercion, or generated or altered using artificial intelligence or other digital technology.

Gender-questioning child means a child or young person who is exploring, questioning or expressing uncertainty about their gender.

Safeguarding means:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children and young people from maltreatment whether that is within or outside the home, including online
- preventing impairment of children and young people's mental and physical health or development
- ensuring children and young people are growing 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 in all areas of school life in line with the outcomes set out in the Children's Social Care National Framework.
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children

Staff includes (unless stated otherwise) temporary, casual, peripatetic, supply teachers, volunteers, specialist teachers/professionals and 1:1 tutors, contractors, trustees and governors

TAC Team around the Child

TAF Team around the Family

TAW Team around the Worker

4. Equalities Assessment Impact Statement

The Trust is committed to treating all people equally and with respect irrespective of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. We are committed to eliminating discrimination and recognise children and young people's diverse circumstances. We ensure that all children and young people have the same protection, regardless of any barriers they may face and we implement our duties under the Equality Act 2010. We have reviewed the effect of this policy on those who may face additional or different barriers to securing its benefits than the population as a whole and have identified that children and young people potentially at greater risk of harm are as likely to be able to access to benefit from this policy as children and young people who are not at the same greater risk of harm. Children and young people potentially at greater risk of harm include those who:

- have a Social Worker or who have returned home to their family from care or who are care leavers, or are privately fostered

- have special educational needs or disabilities or have certain health conditions (including mental health needs) and has specific additional needs
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality including any child or young person who does identify as or is perceived to be by other children and young people, lesbian, gay, bi-sexual or transgender
- have English as an additional language
- are known to be living in difficult situations – for example, homelessness or temporary accommodation or where there are issues such as substance abuse or domestic violence or family histories of poor mental health, parental offending or a family member in prison
- are at risk of honour based violence, which may include FGM, sexual exploitation, forced marriage, or radicalisation
- who are asylum seekers
- show signs of being drawn in to anti-social or criminal behaviour, including misuse of drugs or alcohol themselves, gang involvement and association with organised crime groups or county lines
- are frequently missing / goes missing from care or from home or is persistently absent from education, including persistent absences for part of the school day
- are at risk of modern slavery, trafficking, sexual or criminal exploitation

5. Principles

5.1 The Six Principles

There are six main elements to our policy:

- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children and young people;
- Raising awareness of safeguarding children and young people and child protection to ensure all staff and volunteers understand their role as part of a wider safeguarding system for children and young people. To ensure all staff and volunteers understand that safeguarding and promoting the welfare of children and young people is everyone's responsibility and, in order to fulfil this responsibility effectively, all practitioners should consider at all times what is in the best interests of the child or young person. To ensure that all staff and volunteers know that no single practitioner can have a full picture of a child or young person's needs and circumstances and to understand the importance of taking concerns and disclosures seriously, taking prompt action, and sharing information appropriately.
- Equipping children and young people with the skills needed to keep them safe; and ensuring stakeholders understand the School's work in this area, particularly parents/families
- Developing and implementing procedures for identifying the breadth and range of abuse, and reporting cases, or suspected cases of abuse and ensuring we share information internally and externally in a timely and appropriate manner to secure the best interests of each child and young person in our Schools;

- Supporting pupils who have been abused in accordance with their child protection plan;
- Establishing a safe environment in which children and young people can learn and develop and feel welcomed to express concerns, whilst ensuring all staff are equipped to understand that children and young people may not feel ready or know how to share concerns around abuse.

5.2 Working with Others

BET is committed to creating and maintaining a safe learning environment for children and young people within its schools, identifying where there are child welfare concerns (taking into account contextual safeguarding) and taking action to address them, in partnership with other agencies. This policy reflects the policies of the applicable Local Safeguarding Partnership, including policies and procedures in relation to:

- (i) the action to be taken where there are concerns about a child or young person's safety or welfare, including thresholds for intervention
- (ii) training of persons who work with children and young people or in services affecting the safety and welfare of children and young people
- (iii) recruitment and supervision of persons who work with children and young people
- (iv) investigation of allegations concerning persons who work with children and young people
- (v) safety and welfare of children and young people who are privately fostered
- (vi) cooperation with neighbouring children's services authorities and their Partnership partners

The individual schools are committed to sharing information which is relevant to protecting and keeping children and young people safe as defined by their relevant local safeguarding partnership at:

5.3 Curriculum

As an equally fundamental implementation of our commitment to ensure safeguarding for young people, BET will contribute through the curriculum and school activities as a whole by developing students' understanding and awareness, and promoting their resilience, whilst providing a safe and secure environment within its schools. This includes ensuring students understand online safety and cyber-safety in general, responsible digital citizenship, as well as relationships, (and related equalities matters), sex and health education (whether physical or mental health), and self esteem. This is delivered across our curriculum in both targeted personal, social, relationships education sessions at individual, tutor, year group and whole school levels as appropriate and embedded in other curriculum subjects including PE; ICT; Science; Humanities; [RE] and Collective Worship] (if SGS)

5.4 The Young Person's Wishes

Where there is a safeguarding concern, BET, and its School leaders will ensure the child or young person's wishes and feelings are taken into account when determining what action to take and what

services to provide. Systems are in place in each BET School. Each BET School is committed to ensuring that all such systems are well promoted, easily understood and easily accessible for children and young people to feel confident to identify and then report any abuse or safeguarding concern, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

6. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. **This policy applies to all Trustees, staff, supply teachers, specialist teachers/professionals or 1:1 tutors, contractors, volunteers and governors working in or on behalf of the school.** We will make the policy available on our Trust and each school's website.

Our policy and procedures also apply to extended school and off-site activities including where home tuition providers are arranged by off site providers or other arrangements made by a School where students under 18 attend local or community activities or groups.

6.1 All Trustees, staff, supply teachers, specialist teachers/professionals and 1:1 tutors, contractors volunteers and governors

All Staff will read and understand part 1 the Department for Education's statutory safeguarding guidance, [Keeping Children safe in Education](#) - annually and review this guidance at least annually.

All Staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL) including the identity of the DSL and any deputies, our School's behaviour policy and anti-bullying/harassment policy (which together includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying), and the safeguarding response to children and young people who go missing from education
- The role of Family Help and early help arrangements, including the importance of identifying emerging needs at the earliest opportunity, understanding local threshold arrangements, liaising with the DSL, and working with other agencies so that children and families receive the right support at the right time. Staff must also be alert to mental health concerns as a potential indicator of abuse, neglect, exploitation, online harm or other safeguarding risk.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child or young person tells them they are being abused or neglected, including specific issues such as FGM, sexual assault or violence, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals. Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting any form of abuse, sexual violence or sexual harassment.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as risk of or involvement with serious violent crime, child criminal exploitation (CCE), child

sexual exploitation (CSE), FGM, child on child abuse including sexual abuse, self harm, suicide and radicalisation.

6.2 The designated safeguarding lead (DSL)

The DSL takes lead responsibility for child protection and wider safeguarding in our school. The DSL liaises with the three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups) and works with other agencies in line with Working Together to Safeguard Children. The DSL will ensure that safeguarding responses take account of the current local Family Help, early help and statutory social care thresholds. The DSL will maintain an understanding of local referral pathways and will ensure that decisions to provide internal support, seek Family Help, refer to children's social care, refer to the police or seek other specialist advice are recorded with a clear rationale. DSLs are all familiar with the guidance *When to call the police* from the National Police Chiefs' Council in order to understand when they should consider calling the police and what to expect when they do. The DSL is also responsible for being aware that where police attend the site, an appropriate adult must be present during any police interview or engagement with a student concerning a suspected or actual criminal offence. This can be the young person's parents.

The DSL will also ensure that concerns involving mental health, self-harm, suicide risk, exploitation, serious violence, online harm, gender-questioning children and alternative provision are considered through a safeguarding lens and escalated where appropriate.

During term time, the DSL will be available during school hours for Staff to discuss any safeguarding concerns and their contact details will be found in Appendix 6.

When the DSL is absent, the Deputy/ies will act as cover. During School Summer Schools, there will always be at least one Deputy or the DSL on duty.

If the DSL and Deputies are not available, the Head of School will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters;
- Take part in strategy discussions and inter-agency meetings and/or support other Staff to do so;
- Contribute to the assessment of children and young people;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support Staff who make such referrals directly and advises on appropriate courses of action that arise from this.
- Record rationale for making decisions, including not to make referral or to do so without informing parents

The DSL will also keep the Head of School informed of any issues, and liaise with the local authority case managers and designated officers for child protection concerns as appropriate.

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

6.3 The Trust Board and Local Governing Body

The Bohunt Education Trust Board maintains accountability for Safeguarding across all Trust Schools and are responsible for approval of the policy at each review. The Bohunt Education Trust Board has appointed a Trustee to lead on safeguarding to monitor the effectiveness of this policy and understand how the Board achieves its aims in Section 1 above through the implementation of this policy in each School and its context. All Trustees receive induction training in safeguarding and their duties under Prevent, as well as annual refresher training.

Each local governing body has delegated responsibility to approve the contextualised appendices of the policy annually and to hold the Head of School to account for its implementation through receipt of an annual report on safeguarding to the LGB. Each LGB also receives annual training on the changes made to Safeguarding Policy and practice within each School; all governors undertake mandatory induction training in safeguarding, understanding their specific duties in Safeguarding, and in their duties under Prevent.

The local governing body will appoint a member from its body as Safeguarding Governor to monitor the effectiveness of this policy in conjunction with the local governing body. This is always a different person from the DSL and is not a member of Staff.

6.4 The Head of School

The Head of School is responsible for the implementation of this policy, including:

- Ensuring that Staff are informed of this policy as part of their induction;
- Communicating this policy to parents, carers and guardians when their child or young person joins the school and via the school website;
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all Staff undertake appropriate safeguarding and child protection training and update this regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

6.5 The CEO

The Chief Executive officer has overall responsibility to the Bohunt Education Trust Board for ensuring that all Schools across the Trust implement this policy and ensuring that appropriate action is taken to remedy any defects in implementation or operation of this policy from time to time. The CEO may delegate any part of this responsibility to the Trust Safeguarding Lead or other employees as he considers appropriate.

The CEO will act as the 'case manager' in the event that an allegation of abuse is made against the Head of School where appropriate (see appendix 3).

6.6 The Trust Safeguarding Lead

The Trust Safeguarding Lead is responsible for monitoring the implementation of this policy, including:

- Working closely with the Head of Virtual School and other colleagues as required, the Trust Safeguarding Lead will oversee all aspects of the Trust's safeguarding arrangements – from

monitoring safeguarding and child protection issues to providing annual training to all employees, governors and trustees. They will also develop bespoke safeguarding training for Staff and will develop strategies for improving current arrangements where necessary.

- They will ensure there is a robust mechanism for monitoring and managing safeguarding and child protection issues across the Trust, providing guidance, support and escalation for schools with safeguarding issues. They will produce an annual report to the Trust Board.
- They will ensure a healthy, robust and knowledgeable ethos of safeguarding in each school, the Trust and the central team. They will remain updated in line with changes to KCSIE and key changes are disseminated to schools and the Trust swiftly, including any necessary training.
- They will review safeguarding and student welfare data returns from Schools to identify best practice to disseminate across the Trust and to understand any specific contextual safeguarding and welfare issues that arise in any particular School and to ensure Trust and School resources are appropriately deployed; supporting and leading in reviews of all aspects of safeguarding practice including record keeping and pastoral strategies and disseminating best practice across schools as a whole.

6a. Alternative Provision

Purpose of Alternative Provision

Alternative provision may be used where a pupil is unable to access full-time education on the main school site and where it is deemed that an alternative setting will better support the pupil's education, wellbeing, or behaviour. This may include, but is not limited to:

- Pupils who are at risk of exclusion or who have been permanently excluded.
- Pupils with medical needs who cannot attend school full-time.
- Pupils requiring a short-term intervention to re-engage with learning.
- Pupils who would benefit from a specialist setting to support specific social, emotional, or behavioural needs.

The decision to place a pupil in alternative provision will always be taken in the best interests of the child, with parental/carers involvement, and will be subject to regular review.

Safeguarding Responsibilities

When the school commissions alternative provision, it retains overall safeguarding responsibility for the pupil, this is not transferred to the provider. The school will ensure:

Due diligence checks are carried out before a placement is agreed. This includes obtaining written confirmation from the provider that:

All staff working with pupils have undergone appropriate safer recruitment checks, including an enhanced DBS check with barred list information where required.

The provider has robust safeguarding and child protection policies in place that are consistent with KCSIE and local safeguarding procedures.

The provider will notify the commissioning school of any staff changes or other safeguarding arrangements that may affect pupil safety.

Clarity of placement – The school will hold up-to-date records of:

The address of the alternative provider and any subcontracted provision or satellite sites attended.

The timetable and agreed days/times of attendance.

The named key contact person at the provision.

Safeguarding policies.

Letters of assurance and/or details of staffing, training records, and safeguarding records, DBS checks.

OFSTED registration details.

Monitoring and review – The school will:

Keep accurate records of attendance and follow up promptly any non-attendance in line with the school's safeguarding and attendance procedures.

Review the placement at least half-termly to ensure the provision remains safe, appropriate, and continues to meet the child's needs.

Immediately review and, if necessary, terminate the placement if safeguarding concerns arise that cannot be satisfactorily addressed.

Communication with parents/carers – Parents/carers will be kept fully informed about the purpose, expectations, and monitoring of the alternative provision placement.

Additional Risks

The school recognises that pupils placed in alternative provision may have complex needs and may be more vulnerable to risks such as exploitation, criminality, and disengagement from education. The school will work closely with the alternative provider, parents/carers, and external agencies as appropriate to reduce these risks and ensure the child remains safeguarded.

7. Procedures across all Schools

In order to minimise risk to students, the main elements to our safeguarding practice are set out below. Each element below is set out in greater detail in this Policy, Safer Recruitment Policy, Volunteer Policy, Reporting Low Level Concerns Policy, linked policies below and our processes and procedures within each school and across the Trust.

- 7.1 We practise safer recruitment in checking the suitability of Staff, to work with children and young people in every academy (see - safer recruitment and DBS checks – policy and procedures) including checking the suitability of Staff and safeguarding procedures in general where children and young people and young people receive part of their curriculum hours off site for any reason or engage in off site activities as part of their school provision
- 7.2 We continually review all practices in order to establish a safe environment in which children and young people can learn and develop including where students are attending trips or visits.
- 7.3 We raise awareness of safeguarding and child protection issues with students and aim to equip them with the skills needed to keep them safe and confident whether online or in person
- 7.4 We ensure Staff know how to conduct themselves with students in accordance with the Teachers Professional Standards and give regular training on child protection and safeguarding. All staff and volunteers in school have read Part 1 (or, if they do not work directly with children and young people, Annex A) of Keeping Children Safe in Education) and re-read it on an annual basis to ensure a common understanding that safeguarding and promoting the welfare of children and young people is everyone's responsibility. Everyone who comes into contact with children and young people and their families has a role to play in safeguarding children and young people.
- 7.5 All staff are informed of the students with social workers and they understand that they have a particular responsibility for removing barriers to learning for this disadvantaged group.
- 7.6 The Trust promotes a strong early help and Family Help ethos. Staff are expected to identify emerging needs and concerns as soon as possible and to discuss these with the DSL. The School may provide internal pastoral or welfare support, seek advice from other professionals, support or initiate a Family Help response, or refer to children's social care where thresholds are met. Staff will support multi-agency assessment and planning where appropriate and will ensure that all actions, decisions and outcomes are recorded on CPOMS.
- 7.7 We recognise that some children and young people are more vulnerable than others and, therefore, may be more at risk from abuse (see Equalities Impact Assessment Statement above).
- 7.8 We carry out appropriate risk assessments in all academies for all school activities (e.g. educational visits) and also for individual children and young people as necessary.
- 7.9 We raise awareness with all students of the risks of technologies through teaching about e-safety and all our academies are 'mobile phone' free as we recognise the risks posed to children and young people from mobile technology including excessive use and lower self esteem.
- 7.10 We encourage a positive atmosphere of openness and support where students are

encouraged to have the confidence to talk to familiar adults with the understanding that they will be listened to. Enough time is dedicated to the pastoral curriculum to allow for teaching of all aspects of safeguarding to empower our students to recognise safeguarding issues that may arise in their own, or their peers' or families, lives and to feel able to raise concerns knowing that they will be trusted and supported. We recognise equally that some children and young people may not feel ready to share or know how to share concerns and we promote the approach of a "professional curiosity" amongst all Staff who should share concerns with the DSL through the reporting mechanisms of this Policy.

7.11 We operate a 'zero-tolerance' approach to child on child abuse, including bullying, cyberbullying, and prejudiced-based and discriminatory bullying (see Behaviour and Anti-Bullying policies as well).

7.12 We have a strong emphasis on student voice through the student council, faculty reviews, policy reviews and the employment of key staff.

7.13 We have procedures for identifying and reporting cases or suspected cases of abuse and are ever vigilant to all concerns regarding any unhealthy opinions or behaviours a child or young person may display as well as recognising not all children and young people are ready to share or know how to share concerns

7.14 We support students who have been abused in accordance with their agreed child protection plan and offer non-prejudicial support for those who make allegations.

7.15 We ensure all Staff have training in child protection procedures at induction and throughout.

7.16 We are committed to working with other agencies (including the Local Authority's Virtual School Head where applicable) in order to safeguard children and young people and setting up an inter-agency assessment as appropriate under the Early Help system

7.17 In all academies, we will consider the child or young person's wishes or feelings when determining what action to take and what services to provide to ensure every child or young person is safe and Staff do not promise confidentiality at any point.

7.18 We ensure there is clear guidance by which low level concerns around Staff or others can be reported.

7.19 The Designated Safeguarding Lead undertakes formal re-designation training at least every 2 years with a recognised trainer.

7.20 The Trust Safeguarding Lead conducts a safeguarding review on an annual basis with all Designated Safeguarding Leads.

7.21 All Local Governing Bodies receive a formal annual safeguarding report from their designated safeguarding lead and the Trust Board receives a formal safeguarding report from the Trust Safeguarding Lead annually. All governors and Trustees undertake safeguarding training at induction, and then refresher training annually. Each Local Governing Body and the Board's Education Committee receive at least termly reports on

safeguarding matters.

8. Confidentiality

As part of the Trust, each School complies with the regulations and expectations outlined by data protection legislation and comply with the Data Protection Policy.

To ensure effective safeguarding of children and young people, it is important that all follow the guidelines below:

- Understand that timely information sharing is essential to effective safeguarding
- While it is recognised that all matters relating to safeguarding individual children and young people are confidential, a member of Staff if confided in by a pupil, **must never** guarantee confidentiality to that pupil as this may not be in the child or young person's best interests
- The parents/carers or guardians of the child or young person should be informed immediately unless it is believed to be not in the best interests of the child or young person, would place them at further risk or harm or where it is believed a crime may have been committed or a statutory authority instructs that the parent/carer/guardian is not to be informed, and gives summary reasons which the DSL (who may seek advice from Head or Safeguarding Lead and/or Director of Governance as available) understands to be lawful
- Where there is a Child Protection concern it will be passed immediately to the DSL who will contact the Local Authority Designated Officer (LADO) following LA guidance/thresholds. If LADO is informed, the DSL will inform the Safeguarding Lead who will inform the CEO unless the Head has already done so
- The Principal / Head of School, DSL or DDSL will disclose personal information about a pupil, including the level of involvement of other agencies, to other Staff only on a 'need to know' basis using approved communication systems
- All staff must be aware that they have a professional responsibility to share information with other agencies, where there is a lawful basis, in order to safeguard children and young people
- Information must only be shared on a 'need-to-know' basis, but consent is not needed to share information if a child or young person is suffering, or at risk of, serious physical or mental harm
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against Staff
- All matters relating to child protection are to be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance

9. Prevention through education

The Trust Board recognises that taking action to enable all children and young people to have the best outcomes is a key part of safeguarding and promoting the welfare of children and young people, and that providing a high quality education that is equitable and accessible to all learners is what underpins this. Therefore, each member school in the Trust will ensure that:

9.1 Each student's provision enables them to achieve their best and become confident individuals living rewarding lives, fulfilling our Trust ethos to enjoy, respect, and achieve.

9.2 All students are supported to make successful transition between phases and then into adulthood, whether into employment, further / higher education or training, and to enjoy and achieve throughout their time at our schools

9.3 Sufficient time, including planning and opportunities for responsive intervention, will be dedicated to a carefully structured PSHE or equivalent curriculum, including RSE, careers, personal development and self esteem, as well as specific age-appropriate teaching of child protection themes including with respect to equalities matters, safe and respectful use of online services and technology to become responsible digital citizens, and promoting positive mental health and wellbeing

9.4 Wherever possible, curriculum links will be made explicit and maximised as opportunities for children and young people to learn about different aspects of safeguarding and child protection in different contexts.

9.5 Opportunities to teach about safeguarding, including age-appropriate teaching on online safety, harmful online content, misogyny, respectful relationships, consent, self-generated intimate images and videos, artificial intelligence and deepfake technology, financial and online scams, misinformation and disinformation, mental health and wellbeing, self-harm, suicide prevention, and how pupils can seek help for themselves or others. Teaching will be responsive to local and national safeguarding trends and will take account of pupils who may have additional vulnerabilities or previous experiences of harm.

9.6 We recognise that there are additional safeguarding challenges that arise in boarding provision, such as at SGS. Boarding provision at SGS therefore has additional prevention and reporting mechanisms set out in the document “Safeguarding in a Boarding Context” available on its website.

10. Children and young people who are looked after by the Local Authority including those previously looked after

10.1 Designated Teacher

Local governing bodies must ensure that the Head of school has appointed a designated teacher to promote the educational achievement of children and young people who are looked after and to ensure that this person has appropriate training. All Schools report annually to their Local Governing Body on this area.

10.2 Looked After Status; reasons

The most common reason for children and young people becoming looked after is as a result of abuse and / or neglect or because of immigration related status. Appropriate school Staff will have the information they need in relation to a child or young person’s looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility; the levels of authority delegated to the carer by the authority looking after them; details of the child’s social worker and the name of the virtual school head in the authority that looks after the child or young person.

We recognise that some children may be living in kinship care arrangements or may be supported by their wider family network. Where appropriate, the DSL and Designated Teacher will work with

the Virtual School Head, children's social care and other relevant professionals to support the educational achievement, welfare and safeguarding of children in kinship care, in line with local arrangements and the child's individual circumstances.

10.3 Information

The Designated Safeguarding Lead will ensure that responsible Staff are aware of the information they require in relation to the student's status, for example, access rights for birth parents or those with parental responsibility and restrictions on photographs/multi media recordings for educational or promotional purposes and at School events where other parents may wish to take photos or recordings of their children and young people and their friends/performers/participants. We recognise that in some cases students will not be from the geographical local authority and will ensure that liaison takes place with the relevant professionals from the appropriate authority.

11. Contextual safeguarding

Designated Safeguarding Leads will be particularly mindful of contextual safeguarding (Firmin 2017). Young people's experiences and relationships beyond the family may mean that they are more or less likely to experience significant harm. This is particularly the case for adolescents who may have access to influences beyond the family, for example, on-line, peer-group, criminal subcultures or adults engaged in criminal activity. This influence occurs at a time when they are particularly vulnerable and suggestible to influence. Peer or other adult (including intra or extra familial) relationships are increasingly influential and may undermine familial relationships. It is for this reason that schools must be safe spaces where Staff are hyper-vigilant to negative peer or external influences including those that challenge school and social norms. Staff must be wary of potentially exploitative child on child relationships, particularly where there is an imbalance of power. Staff must never underestimate the weight of peer or intra or extra familial adult influence and must report this as a safeguarding concern where they witness it occurring.

11.1 CSE and CCE occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual or criminal activity, often referred to as grooming. The abuse may take various forms, including enticement and or violence. The victim may believe that their involvement is consensual, however, by nature of the power imbalance, this is not the case. In the areas that we serve, CSE and CCE is a prevalent contextual safeguarding issue e.g. sexual exploitation and 'County Lines'. See Annex B of Keeping Children Safe in Education for more information.

11.2 All Staff must be aware and trained on the indicators that young people are at risk of, or involved in, serious violent crime. As we know, the context in which our academies are based can mean that our children and young people are vulnerable to being exploited by criminal networks or gangs.

12. Recognising abuse and/or welfare (including self harm/suicide issues) and taking action

Staff (as defined above), must follow the procedures set out below in the event of a safeguarding issue.

12.1 If a child or young person is in immediate danger

Make a referral to children's social care and/or the police immediately if a child or young person is in immediate danger or at risk of harm. Anyone can make a referral. This can include self harm or suicide attempts where the child or young person is in immediate danger.

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

We encourage all members of Staff to speak to the DSL or Deputy before making a referral, however all staff are able to contact Children's Services independently. The contact details are in Appendix 6.

12.2 A disclosure is made to you

Please follow the procedures in Appendix 4.

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

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

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

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

Any teacher who discovers that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

12.4 If you have concerns about a child or young person (as opposed to a child or young person being in immediate danger)

Appendix 2 illustrates the procedure to follow if you have concerns about a child or young person's welfare and the child or young person is not in immediate danger. You are encouraged to have professional curiosity around any young person, as Schools recognise that young people may not feel ready or be able to share experiences of abuse, exploitation or neglect as being harmful or are

embarrassed or humiliated or threatened. You are advised to log concerns via CPOMs rather than speaking to the DSL alone- an entry on CPOMs enables the DSL to review all material at one point in time, and ensures the DSL can build a clearer picture with clear dates and times. You may also speak to your pastoral lead or other pastoral leader to seek further advice and clarification over next steps to take but all such advice, clarification and steps must be logged onto CPOMs

Where possible, please consider logging via CPOMs and following up as needed with the DSL directly first to agree a course of action to ensure that the School can continue to act in the child or young person's best interests as a whole. Alternatively, you may make a referral to children's social care and/or the police directly: it helps the School and Trust as a whole to continue to act in a child or young person's best interest if you can tell the DSL as soon as possible that you have done so.

This includes with respect to addressing suicide attempts where a child or young person is not in immediate danger or risk of harm, and self harm

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Staff must treat mental health concerns as potential safeguarding concerns where they may indicate abuse, neglect, exploitation, trauma, online harm, coercion, serious violence, bullying, discrimination or risk of self-harm or suicide. Staff are not expected to diagnose mental health conditions, but must record and report concerns promptly so that the DSL can consider the appropriate safeguarding, pastoral, health or external agency response.

12.5 If you have concerns about extremism

If a child or young person is not at immediate risk of harm, where possible, log on CPOMs or speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above): please tell the DSL to ensure that the School and Trust can continue to act in the child or young person's best interests. All such liaison should be logged on CPOMs and followed up with next steps/status of referral, including any requests for further information/updates you or the DSL make.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that school Staff can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger

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

12.6 Concerns about a member of Staff (as defined)

If you have concerns about a member of Staff, speak to the Head of School. If you have concerns about the Head of School or chair of the Local Governing Body speak to the CEO and if you have concerns about the CEO, please speak to the Chair of the Board of Trustees. If you have concerns about the Chair of the Board of Trustees, speak to the local authority designated officer, although we encourage you to let the CEO know of your concerns to ensure we can take appropriate action.

You can also discuss any concerns about any Staff member with the DSL in accordance with the Staff Code of Conduct and the Low level Concern Reporting Guidance.

The head of School/CEO/Chair of the Board/DSL will then follow the procedures set out in Appendix 3, if appropriate.

12.7 Allegations of abuse made against other pupils (Child on child abuse)

All Staff should be aware that children and young people can abuse other children and young people, this can happen both inside and outside of school, as well as online, and that no reports being made does not mean that child on child abuse is taking place. In light of this, the Trust is committed to:

- Ensuring all Staff are able to recognise the indicators and signs of child on child abuse and know how to identify and respond to it and report concerns.
- Ensuring all Staff are knowledgeable about the different forms of child on child abuse, which includes (but may not be limited to) the forms set out in Appendix 1.
- Ensuring we create a culture of safety by challenging inappropriate behaviours between children and young people such as misogyny, misandry, sexualised language, harmful online content and behaviours that normalise harassment, coercion, intimidation or abuse and not downplaying or dismissing behaviour that is actually abusive in nature by saying things like “it’s just banter”, “just having a laugh”, “part of growing up” or “boys will be boys” or “girls will be girls”.
- Having a ‘zero tolerance’ approach to managing child on child abuse in any form.

Following the statutory guidance set out in Part 5 of Keeping Children Safe in Education regarding response to all reports and concerns of child on child sexual violence and sexual harassment.

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

- Is serious, and potentially a criminal offence including upskirting
- Could put students in the school at risk of serious harm to mental or physical health
- Is violent
- Involves pupils being forced to use drugs or alcohol or other serious violent crime
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos, including consensual or non - consensual sharing of

nude or semi - nude images or videos, coerced or pressured image sharing, image-based abuse, and images or videos created, manipulated or disturbed using artificial intelligence, deepfake technology or other digital tools of any person or any other form of harmful sexual behaviour

If a student makes an allegation of abuse against another student

- You must tell the DSL and record the allegation on CPOMs, but do not investigate it at this stage
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence in accordance with National College of Police "When to report to the Police" and as part of this contact will discuss with the local authority and police what information should be shared by the School with the parents of the victim, the victim, the parents of the alleged perpetrator and the alleged perpetrator
- The DSL will put a risk assessment and support plan into place for all children and young people involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

All Staff will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour regardless of its perceived level of harm
- Noting that national research shows that more girls are likely to be victims of sexual abuse and boys are more likely to be perpetrators, we will ensure Staff are being vigilant to issues that particularly may affect different genders more than other genders– for example, male students who attempt to use or do use sexualised or aggressive touching or grabbing towards female pupils or upskirting
- Acknowledging that children and young people who identify as, or are perceived as being by other children and young people, lesbian, gay, bi-sexual, gender-questioning or transgender may be potentially at greater risk of harm and as such endeavouring to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of Staff
- Ensuring our curriculum (including with respect to equalities, digital citizenship, online safety, relationships and sex education and personal, social and health (both physical and mental) education) and behaviour expectations helps to educate students about appropriate behaviour, consent, self-esteem, wellbeing and body confidence
- Ensuring students know they can talk to Staff confidentially by highlighting this through pastoral programmes, PHSE or RSHE and Tutor sessions, and considering the use of anonymous abuse report mechanisms
- Train peer mentors who know to pass on concerns and never offer confidentiality
- Ensuring Staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves including at risk from or involved with serious violent crime, and that this would fall under the scope of this policy to ensure that the alleged perpetrator is also protected appropriately.

12.8 Domestic Abuse

All staff, volunteers, governors, trustees, specialist teachers/professionals and 1:1 tutors recognise that young people who see, hear or experience domestic abuse are victims of abuse as if they had suffered an act of domestic abuse directly.

12.9 Self Harm/Suicide/Other welfare issues

All Staff recognise that young people may feel reluctant and concerned to share disclosures around self-harm or suicidal feelings, thoughts or attempts with adults for a variety of reasons, including fear of feeling judged, or feeling ashamed, or their voice disregarded. We ensure that all Staff feel able to speak compassionately and confidently, when appropriate, with young people about self-harm, particularly when a young person is struggling, and to foster good relationships between young people and the professionals and services whom young people can access for help and support.

For more information about developing guidelines for responding please see Appendix 4.

We will ensure that Staff who have worked with a student who has self harmed, or disclosed self harm, or suicidal thoughts, feelings or attempts, are trained, advised and supported when dealing with these issues and supported by the AHT wellbeing and DSL when working with young people. Further training in this area is available through our pastoral and staff CPD programmes.

12.10 Gender questioning children

Where a child is questioning their gender, we will respond with sensitivity, care and professional curiosity. Any support will be considered on a case-by-case basis, taking account of the child's age, maturity, wishes and feelings, safeguarding needs, mental health and wellbeing, parental responsibility, equality duties, relevant records, and the wider school context. Staff must not make informal or unilateral arrangements. Concerns, requests for support, proposed changes to provision, or questions about confidentiality must be discussed with the DSL and, where appropriate, senior leaders. We will usually involve parents or carers unless doing so would increase the risk of significant harm or is otherwise contrary to safeguarding advice. Any decision not to involve parents or carers must be recorded with a clear safeguarding rationale. Arrangements relating to names, pronouns, uniform, toilets, changing facilities, residential visits, sport, single-sex spaces or records will be risk assessed and kept under review.

13. Notifying parents

Where appropriate and where permitted legally, we will discuss any concerns about a child or young person with the child or young person's parents, carers and guardians. The DSL or pastoral leader will normally do this in the event of a suspicion or disclosure.

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

If we believe that notifying the parents, carers or guardians would increase the risk to the child or young person, we will discuss this with the local authority children's social care team before we notify the parent. Where a decision is made not to notify parents, the Headteacher will be informed, and the reasons recorded on CPOMs together with the legal basis for sharing as required under data protection.

When a child or young person asks us not to share information with their parent/carer, we will work with them to identify the benefits of involving their parents, and how their parents can help: where a child or young person continues to ask us not to share such information, or limit it, the DSL must be informed and will take further advice as appropriate on the nature of informed consent balanced with the need to keep the child or young person safe from harm in each particular individual case. Where appropriate, appropriate staff trained in assessing Gillick competency with local authority support will be consulted. Again, where a decision is made not to notify parents, the Headteacher will be informed and reasons recorded on CPOMs together with the legal basis for sharing as required under data protection.

In the case of allegations of abuse made against other children and young people, we will normally (unless sharing the information will put a child or young person at additional risk or we are instructed not to share information by a statutory agency), notify the parents, carers or guardians of all the children and young people involved together with an explanation of the steps we are taking in School to keep both the student making the allegation and those against whom the allegation is made safe.

We will work with other agencies to ensure information sharing is consistent, and where a statutory agency instructs us not to notify a parent, carer or guardian the DSL will ensure that the reasons for such instruction are lawful, and the reasons together with the instruction logged on CPOMs, and that the instruction will be reviewed regularly.

14. Prevent duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act (2015), in the exercise of functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

14.1 All DSLs will also be trained in Prevent and related safeguarding issues.

14.2 Statutory training on the Prevent duty will be delivered in all Schools to all Staff (using our usual format) and governors/Trustees annually.

14.3 PSHE or equivalent curriculum, as well as wider curriculum links where they can be made, will explore themes relating to the Prevent duty so that children and young people are informed and equipped with the knowledge to recognise early signs of radicalisation and links to extremism.

15. Online Safety

15.1 The Trust recognises that it is essential that children and young people are safeguarded from potentially harmful and inappropriate material online, which can include harmful sexual behaviour or self harm and suicide attempts. In response to this, the Trust is committed to:

- Ensuring a whole academy approach that is reflected in the breadth and depth of the School curriculum as well as non curriculum based activity to online healthy relationships and safety (including maintaining self esteem and confidence and mental health) that protects and educates both Staff and students in their use of online services and technology to ensure

they become and act as responsible digital citizens and establishes mechanisms to identify, intervene in and escalate concerns where possible,

- Ensuring awareness of the 'four Cs' of online risk including with respect to the use of generative artificial intelligence and the transparency/fairness of automation in machine learning and algorithmic systems – content, contact, conduct and commerce – amongst both Staff and students and having policies and procedures in place to address all areas of risk which is supported by other policies including the School's Relationship and Sex Education Policy, Anti Bullying and Harassment Policy and pastoral and welfare systems
- Where children and young people are being asked to learn online at home, to have regard to the DfE advice regarding remote education as well as advice provided by the NSPCC and PSHE Association, as reflected on the Online Safety and Acceptable Use of Technology policy.
- For each academy to have appropriate filtering and monitoring technology on all devices used by Staff and students in school which is reviewed (at least annually and recorded (Appendix 9)) and monitored for effectiveness, and which are notified to parents/carers. Each Academy will assign roles and responsibilities for filtering and monitoring, ensuring over-blocking is not taking place, yet there is blocking of relevant content without unreasonably impacting learning.
- For each academy to have appropriate levels of e-security/cybersecurity protection procedures in place for Staff and students and for these to be regularly reviewed in order to keep up with changes in the sector and as required to secure compliance with IT security and data protection.
- For all aspects of online safety to be regularly reviewed in order to keep up with the latest changes to technology, risk and potential harms in this rapidly evolving sector. The 360 degree safe website is a free online self-review resource that can support this.
- To work with parents/carers/guardians and families, and other stakeholders (e.g. community groups or feeder schools) to ensure all those engaged with a child or young person's education inside and outside School feel equipped and able to engage with online safety in the best interests of each young person in our Schools, to understand the activities/sites students will be asked to participate in online for educational purposes outside of timetabled lessons and the individuals they will be in contact with through these activities and how to support their child or young person to become a responsible digital citizen, including with respect to the benefits and risks of generative artificial intelligence

15.2 The Four Cs are:

content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

contact: being subjected to harmful online interaction with other users; for example: child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes or engage in "copycat" harmful behaviours including self harm or suicide attempts'.

conduct: personal online behaviour that increases the likelihood of, or causes, harm. This includes bullying, harassment, misogynistic or discriminatory behaviour, sharing or requesting

self-generated intimate images or videos, consensual or non-consensual sharing of nude or semi-nude images, creating or sharing AI-generated or deepfake intimate images, encouraging self-harm or suicide, harmful challenges, hazing, initiation-type behaviours, and online behaviour that adversely affects self-esteem, body confidence, wellbeing or safety.

commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams: this includes encouraging or advising children and young people to sign up to apps or software that might be free and helpful for a project/programme of study, but you must be satisfied that such an app/software is not funded by advertising to users in return for it being free. If you feel children or young people or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

15.3 Mobile phones

All BET schools should be mobile phone free by default. Schools will implement processes whereby pupils will not have access to their mobile phones throughout the school day including during lessons, between lessons, breaktime and lunchtimes- headteachers will decide how best to achieve this within their own contexts.

16. Whistleblowing

All Staff should be able to raise concerns should they consider there to be poor or unsafe practice and potential failures in the safeguarding regime and know that concerns are taken seriously by the leadership team. The Whistleblowing Policy is available on the website of Bohunt Education Trust under “statutory policies”.: The NSPCC whistleblowing helpline is available for Staff who feel unable to raise concerns directly on 0800 028 0285 or help@nspcc.org.uk

17. Record keeping and Information Sharing

17.1 Record Keeping

All concerns, discussions, steps, strategies, interventions and decisions made, and the rationale for those decisions, should be recorded in writing using CPOMS. Information must be kept confidential and stored securely. All concerns and referrals must be kept in a separate child or young person protection file for each child or young person. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome;
- contact with any third party agency including the police must be recorded on CPOMs; giving details of date, time, contact name and purpose of contact; be specific when recording instructions from agencies and ensure that your record makes it clear that you have been “instructed” or “requested” as the case may be.

If in doubt about recording requirements, Staff should discuss with the designated safeguarding lead (or deputy).

We will hold records in line with our records retention schedule, which can be provided upon request.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

A centralised computerised record is stored electronically (CPOMS), with access only granted to members of the Child Protection team (DSL and Deputies). Should a child or young person leave the school, a copy of their safeguarding file is given to the new provider's DSL and a record of receipt is kept, provided the School has received direct confirmation from a new school that the child is on roll and the safeguarding file is to be transferred via the CTF (or if overseas, through an agreed secure route and subject to data protection legislation).

In addition:

- Our safer recruitment policy provides further information on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against Staff
- All School Staff will follow the protocols and processes set out to ensure all welfare, pastoral and other health checks are recorded as having been undertaken; date; time; person even where there is a "zero" /no substantive report made. Further guidance is available from your DSL and AHT Wellbeing.

17.2 Information Sharing

Practitioners should use their judgement when making decisions about what information to share, but when in doubt about a decision to share personal information, seek advice from DSL initially, who may also suggest additional routes for advice (e.g. Children's Services, legal advisers, or data protection officer). Practitioners will have regard to the guidance here https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf and seek advice where needed.

All information shared by Staff will be, unless in an emergency, shared with external agencies and internally in the most secure way possible: all staff recognise, as set out in the Data Protection Policy, that use of email is insecure for confidential information. Wherever possible, information requested by others to inform decisions and action they take which is to be sent electronically must be by the most secure means available at the time; password protected attachments to email or securer shared areas accessible only to those to whom the link was sent and with approval of the shared area owner.

18. Training for Staff

All Staff will receive training and development as follows:

- at induction
- formal training is delivered at least annually
- regular updates are provided to Staff via emails, bulletins and staff meetings

We keep safeguarding at the forefront of everyone's thinking and practice.

19. Monitoring provisions

The Trust Board will review this policy annually. It will receive and scrutinise an annual safeguarding report from the Trust Safeguarding Lead to help identify the impact of this Policy. The Education Committee will receive termly student welfare data including safeguarding data. Local Governing Bodies will review the School specific provisions of this Policy annually and will receive an annual safeguarding report from their DSL and termly student welfare data including safeguarding data in the termly Heads' reports.

20. Links to other policies

Safeguarding students is a core function of the Trust and a whole-school approach is maintained in all our academies. As such, this policy relates to many other policies and internal procedures and in particular the following:

- Anti-Bullying and Harassment
- Attendance
- Behaviour
- Physical Intervention and Search Policy
- Data Protection Policy
- Digital Policy(Staff and Student Acceptable Use of Information Technology Policy/Agreements)
- Educational Visits
- Elective Home Education Protocol
- Equalities Objectives
- Health and Safety
- Staff Code of Conduct/LGB/Trustee Code of Conduct
- Relationship and Sex Education Policy
- Reporting Low Level Concerns
- Safer Recruitment
- SEND
- Whistleblowing

Appendix I: Definitions, types of abuse and indicators

Safeguarding and promoting the welfare of children and young people means:

- Protecting children and young people from maltreatment
- Preventing impairment of children and young people's 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

Child protection is part of this definition and refers to activities undertaken to prevent children and young people suffering, or being likely to suffer, significant harm.

Abuse including child criminal exploitation and child sexual exploitation; is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. This appendix explains the different types of abuse.

Child on child abuse

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Equally, children and young people displaying harmful sexual behaviour may be displaying their own abuse or trauma, and the DSL will work to ensure they too are supported appropriately. We recognise that children and young people may not always feel able to or know how to share concerns of abuse and all staff will continue to act with "professional curiosity".

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

- bullying (including social media/closed app based group fora or other forms of cyberbullying, prejudice-based and discriminatory bullying);
- abuse or sexual harassment in intimate personal relationships between peers (including extra familial and teenage relationships);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse including encouragement to self harm or suicide attempts);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos, including consensual or non - consensual sharing of nude or semi - nude images or videos, coerced or pressured image sharing, image-based abuse, and images or videos created, manipulated or disturbed using artificial intelligence, deepfake technology or other digital tools;

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health (which need not just be physical health) or development. This appendix defines in more detail.

Children and young people **includes everyone under the age of 18.**

There are four main categories of abuse – physical injury, neglect, sexual abuse and emotional abuse. The list of indicators given is not exhaustive or comprehensive but consists of frequently observed indicators. It is important to remember that most abuse involves more than one main type, for example, sexual and emotional abuse may be recognised together. These indicators, for example cuts and grazes, may also be accidental and not a sign of abuse.

Physical Abuse

“Actual or risk of physical injury to a child or failure to prevent physical injury (or suffering) to a child, including deliberate poisoning, suffocation and factitious illness by proxy. This includes excessive punishment”. Physical Abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.

Indicators:

Behaviour changes/wet bed/withdrawal/regression	Finger marks
Frequent unexplained injuries	Broken bones
Afraid of physical contact	Cuts and grazes
Violent behaviour during role play	Cigarette burns
Unwillingness to change clothes	Cowering
Aggressive language and use of threats	
Bruising in unusual areas	
Changing explanation of injuries	
Not wanting to go home with parent or carer	

Neglect

Actual or risk of persistent or severe neglect of a child is the failure to meet a child's basic physical and/or psychological needs and/or failure to protect a child from exposure to any kind of danger. Extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development, including failure to thrive. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child or young person is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child or young person from physical and emotional harm or danger (including where they see, hear or experience domestic or other abuse)
- Ensure adequate supervision (including the use of inadequate care-givers)
- 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.

Indicators:

Lack of appropriate clothing	Dirty
Cold - complaining of	Body sores
Hunger - complaining of	Urine smells
Unkempt hair	No parental interest
Not wanting to communicate	Behaviour problems
Attention seeking	Lack of respect
Often in trouble	Bullying
Use of bad language	Always out at all hours
Lack of confidence - low self esteem	Stealing
Jealousy	Significantly underweight

Sexual Abuse

“Actual or risk of sexual exploitation of a child or adolescent. The child may be dependent and/or developmentally immature. The involvement of dependent, immature children and adolescents in activities to which they are unable to give informed consent or that violate the social taboos of family roles”. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or young person is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children and young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children and young people to behave in sexually inappropriate ways, or grooming a child or young person in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children and young people, and this can apply in extra familial/teenage relationships

Indicators:

Inappropriate behaviour – language	Withdrawn
Change of behaviour	Role play
Rejecting physical contact or demanding attention	Rocking
Physical evidence – marks, bruising	Knowledge
Pain going to toilet, strong urine	Stained underwear
Bruising/marks near genital area	
Drawing – inappropriate knowledge	
Relationships with other adults or children and young people for example, being forward	

Emotional Abuse

“Actual or risk of severe adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill-treatment or rejection. It is important to remember that all abuse involves some emotional ill-treatment”.

Some level of emotional abuse is involved in all types of maltreatment of a child or young person, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child or young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child or young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children and young people. These may include interactions that are beyond a child or young person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or young person participating in normal social interaction
- Seeing or hearing the ill-treatment (which may be wider than physical ill treatment) of another, including domestic abuse
- Serious bullying (including cyberbullying), causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children and young people or encouragement to participate in self harm or suicide attempts

Indicators:

Crying	Rocking
Withdrawn	Not wanting to socialise
Cringing	Bad behaviour
Aggression	Behaviour changes
Bribery by parent	Self infliction
Lack of confidence	Attention seeking
Isolation from peers – unable to communicate	Clingy
Afraid of authoritative figures	
Treating others as you have been treated	
Picking up points through conversation with children and young people	

Modern slavery

Modern slavery is an umbrella term for severe exploitation where an individual is controlled by another through violence, threats, deception, or coercion for personal or commercial gain.

Modern slavery may involve:

- Labour Exploitation: Forcing people to work for little or no pay under terrible conditions, frequently seen in construction, agriculture, car washes, and manufacturing.

- Human Trafficking: Using force, fraud, or coercion to recruit, harbor, or transport individuals for the explicit purpose of exploitation.
- Criminal Exploitation: Coercing individuals—especially minors—into illegal acts, such as shoplifting, "county lines" drug trafficking, or forced cannabis cultivation.
- Sexual Exploitation: Manipulating or physically forcing individuals into commercial sex work or non-consensual sexual acts for another's profit.
- Domestic Servitude: Isolating individuals inside private homes to perform endless chores and childcare with severely restricted freedom.
- Debt Bondage: Forcing individuals to work to pay off an inescapable, often artificially inflated debt.
- Forced Marriage: Forcing someone into marriage without their full, free consent.

Indicators:

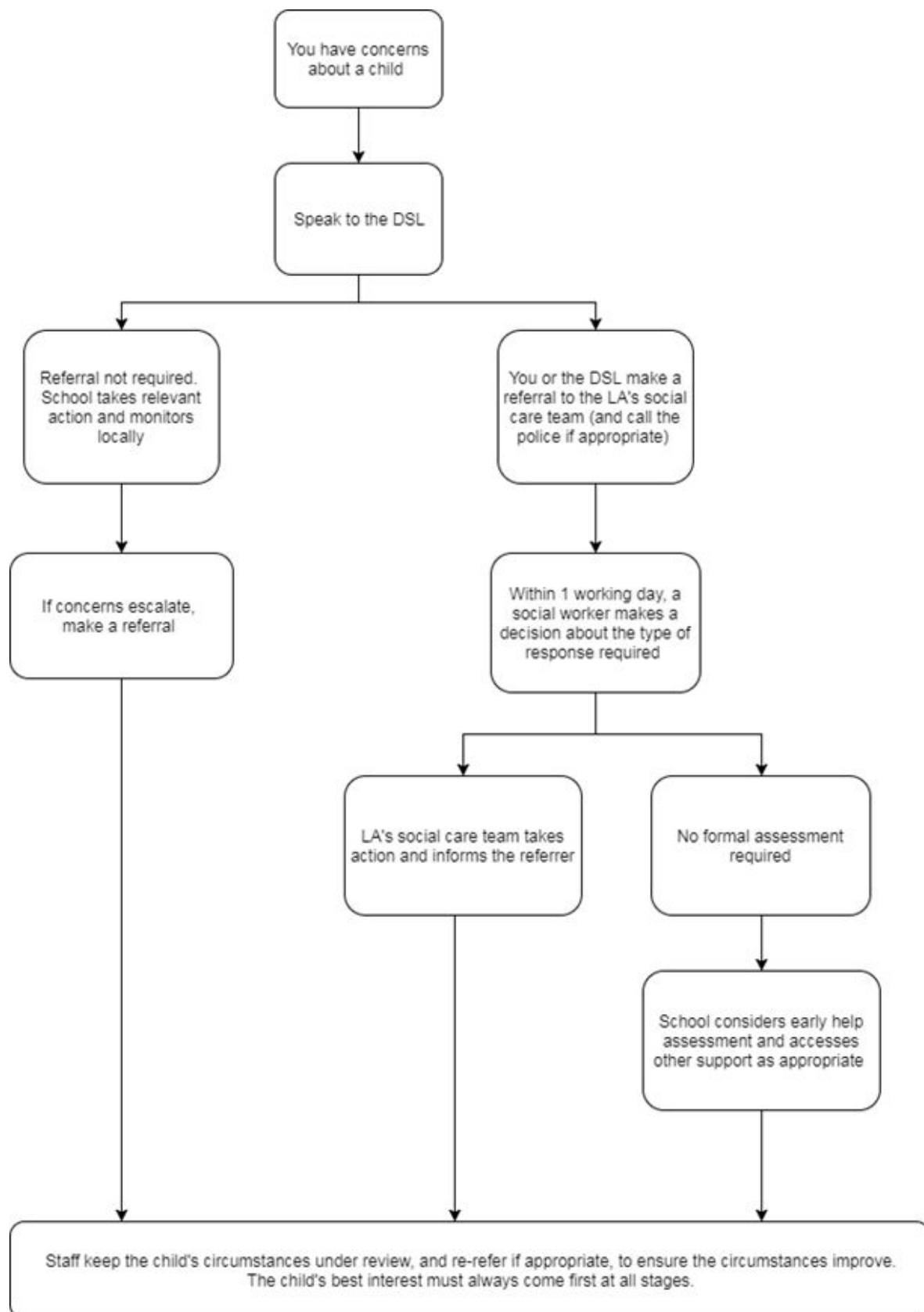
Physical Appearance

Isolation & Restriction

Poor Living Conditions

Submissive Behaviour

Appendix 2: Flowchart for the procedure if you have concerns about a child or young person's welfare (no immediate danger)



Appendix 3: Allegations of abuse made against staff, supply teachers, specialist teachers/professionals, 1:1 tutors, volunteers, trustees or governors

This section of this policy applies to all cases in which it is alleged that a current member of staff, volunteer, specialist teacher/professional, 1:1 tutor, trustee or governor has:

- Behaved in a way that has harmed a child or young person, or may have harmed a child or young person, or
- Possibly committed a criminal offence against or related to a child or young person, or
- Behaved towards a child or young person or children and young people in a way that indicates he or she would pose a risk of harm to children and young people

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher (including specialist teachers or 1:1 tutors) who is no longer teaching and historical allegations of abuse will be referred to the police.

It will be read in conjunction with our Reporting Low Level Concerns Policy: [BET Low Level Concerns Guidance 2025.docx](#)

We will deal with any allegation of abuse against a member of staff, volunteer, specialist teacher/professional, 1:1 tutor, trustee or governor very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

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

Suspension

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children and young people concerned
- Providing an assistant to be present when the individual has contact with children and young people
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children and young people
- Moving the child or children and young people to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Head of School (or CEO where the Head of School is the subject of the allegation or Chair of the Board if the CEO is the subject of the allegation or the local authority designated officer if the Chair of the Board) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children and young people or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children and young people at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice and guidance will be sought from the local authority designated officer, police and/or children's social care services, as appropriate before making a decision to suspend, unless another statutory authority directs suspension
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the local authority designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the local authority designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed, advised or guided by the local authority designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate and act on the directions of the case manager
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. Staff will be given relevant details of trade union representatives and will be able to arrange for a colleague to provide support. Each BET School has an HR Officer (or you may contact BET HR) who will highlight professional bodies who will be able to provide support. Inform the parents or carers of the child or young person/children and young people involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child or young person/children and young people involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child or young person, or if the individual otherwise poses a risk of harm to a child or young person

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teacher Regulation Agency.

Where the police are involved, wherever possible BET will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the local authority designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teacher Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or young person or children and young people who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

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

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven following the School's internal investigations to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious following the School's internal investigations.

Where an individual resigns or leaves their role prior to completion of the School's internal investigations, and the School is advised, guided or in exceptional circumstances directed by another statutory authority to make a referral to another statutory body, including the DBS or TRA, the School may however be required to disclose that a referral was made to such a body, together with the recorded outcome.

Learning lessons

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

This will include consideration of (as applicable):

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

Appendix 4: Specific safeguarding issues

If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively you may make a referral to children's social care and/or the police directly: it helps the School and Trust as a whole to continue act in a child's best interest if you can tell the DSL as soon as possible that you have done so.
- Do not promise to keep the disclosure confidential.

Early help and Family Help

If early help/family help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. All such liaison should be logged on CPOMs and followed up with next steps/status of referral, including any requests for further information/updates you or the DSL make.

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

Referral

If the DSL determines it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. All such liaison should be logged on CPOMs and followed up with next steps/status of referral, including any requests for further information/updates you or the DSL make.

If you make a referral directly, it helps the School and Trust to continue to act in the child's best interests if you tell the DSL as soon as possible and record this on CPOMs

The local authority is required by law to make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. The follow up and decision must be recorded on CPOMs with a note of the next steps to be taken (whether internal or external)

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

All such liaison should be logged on CPOMs and followed up with next steps/status of referral, including any requests for further information/updates you or the DSL make. This may include consideration of support for siblings or other family members where a report of sexual violence or harassment has been made.

Children and young people missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children and young people are at risk of being victims of serious violent crime, harm, exploitation or radicalisation. This includes students 'absent' from education over repeat occasions or for prolonged periods of time.

There are many circumstances where a child may become missing from education, but some children and young people are particularly at risk. These include children and young people who:

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

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

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

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

Child Criminal Exploitation including County Lines

Criminal exploitation is child abuse where children and young people are manipulated and coerced into committing crimes.

County Lines is the police term for urban gangs exploiting young people into moving drugs from a hub, normally a large city, into other markets - suburban areas and market and coastal towns - using dedicated mobile phone lines or “deal lines”. Even children and young people who are as young as primary phase education have been exploited into carrying drugs for gangs. This can involve children and young people being trafficked away from their home area, staying in accommodation and selling and manufacturing drugs. This can include:

- Airbnb and short term private rental properties
- budget hotels
- the home of a drug user, or other vulnerable person, that is taken over by a criminal gang- this may be referred to as cuckooing.

Some specific forms of CCE can include children and young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Children and young people can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children and young people involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children and young people), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non contact activities, such as involving children and young people in the production of sexual images, forcing children and young people to look at sexual images or watch sexual activities, encouraging children and young people to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. 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. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who

can legally consent to have sex. Some children and young people may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

If a member of staff (or volunteer or governor or trustee) suspects CSE, they will discuss this with the DSL or may make a referral directly. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

FGM

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

Section 12.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children and young people about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

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

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children and young people from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children and young people at risk.

We will assess the risk of children and young people in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partnership and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff, volunteers, trustees or governors are concerned about a student, they will follow our procedures set out in this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Serious Violent Crime

Staff are aware of the involvement or risk of involvement for students with serious violent crime, including “county lines”. Indicators of such involvement may include:

- Increased absence from school, particularly “missing” episodes;
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self harm
- Significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

If staff, volunteers, trustees or governors are concerned about a student they will follow our procedures set out in this policy, including discussing their concerns with the DSL. Where staff become aware that a child may be carrying a weapon, has used or threatened to use a weapon, is at risk of serious violence, or is being coerced, exploited or groomed into serious violence, they must report this immediately to the DSL or a senior leader. The DSL will consider immediate safety, search and confiscation powers, risk assessment, parental contact, support for victims and other pupils, liaison with police, children’s social care, youth justice or other agencies, and whether the child may also be a victim of exploitation or modern slavery.

Specifically where a child may have been used to transport drugs, staff, volunteers are aware that they may make a referral directly via the National Referral Mechanism <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

Domestic Abuse

Staff are aware that young people who see, hear or experience acts of domestic abuse are equally victims of domestic abuse as if they had suffered the act of domestic abuse directly, and that this can have a lasting and long term impact on the witness of the abuse. Domestic abuse can be physical, emotional (including through financial or psychological control), sexual or neglect and that mal- or ill-treatment can include non physical harm and witnessing any form of domestic abuse or domestic harm can have equally long term impacts. Staff also recognise that young people can **perpetrate** acts of sexual harassment and domestic **abuse in their own familial, and extra-familial and intimate relationships**

Home Education

All Bohunt Education Trust Schools follow best practice in responding to parental notification of election to home educate their child, and work with each local authority to ensure that any safeguarding issues are addressed and responded

Self Harm/Suicide

If a student discloses self harm, or self harm is observed in School, or the student shares suicidal thoughts or worries with you:

- stay calm and follow first aid guidelines as required;
- If you have immediate concerns that require emergency treatment (an overdose for example), you must call 999 immediately;

- Acknowledge any physical pain that has arisen from self harm or suicide attempt;
- Acknowledge the emotional distress the student is feeling that led to the incident of self harm or the feelings of suicidal thoughts or the attempt;
- Ask the student to hand over any objects they have with them that they are using to self harm or commit attempted suicide, and let them know that the DSL will speak to them about how to be given these back at the end of the day (which will usually, in practice, be by the DSL/DDSL handing the objects to the parents/carers)
- Focus on providing acceptance and support; use non judgmental language
- Advise the student you will need to tell the DSL, who will follow best practice in determining what next steps should be taken both immediately (including obtaining the student's consent to share information with parents and the steps to take if such consent is not provided), supporting any students who witnessed the self harm or suicide attempt or heard or observed self harm or suicidal thoughts as well as in the future considering safety plans and referrals to agencies
- Inform your DSL of any websites/apps/platforms any student referred to in inciting or encouraging self harm or suicide attempt or suicidal thoughts/feelings and ensure these are blocked by the school's filtering systems

Appendix 5: Localised safeguarding issues

Online Safety

It is essential that children and young people are safeguarded from potentially harmful and inappropriate online material. We seek to protect and educate children and young people, and staff in their use of online services, and technology and use/review mechanisms to identify, intervene in, and escalate any concerns where appropriate. We also work with parents and other stakeholders to assist them in safeguarding young people from potentially harmful and inappropriate online material when away from School. We ensure that parents, carers and guardians understand the systems the school uses to filter/monitor online use in School and the individuals, activities and sites/applications children and young people are asked to engage with online for school activity, by ensuring we provide this information on our website as required by KCSiE. We regularly review the effectiveness of our online filtering and monitoring systems for effectiveness.

Bohunt Wokingham provides informed and age appropriate learning regarding online safety through PSHE lessons and through Computing lessons. If required, targeted support is provided by the Pastoral Support Team in response to any concerns raised regarding a student's online safety.

Smoothwall is used across the school's network to ensure effective filtering and monitoring of any inappropriate online activity from staff and students, and any concerns flagged regarding student actions online while using the school's network are logged on CPOMS and therefore flagged immediately to the Safeguarding and Pastoral Teams. All concerns are then addressed by the Safeguarding and/or Pastoral Teams, with swift parent/carers contact as appropriate.

Any home learning required as part of the school's curriculum is outlined on Class Charts, with further information found on each student's Google Classroom account. Should any household have a concern regarding this, they should contact the Class Teacher directly or the Year Progress Lead for their child; any significant or serious concerns about this to be raised with Sophia Martinez DSL directly.

Checking the identity and suitability of visitors

All visitors to our site are required to sign in at Reception. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Anyone who cannot provide evidence to support a clear check on the Disclosure and Barring Service (DBS) must wear a red lanyard and is supervised by a member of staff throughout their time on site.

Visitors are expected to sign in at Reception via the electronic system and wear a visitor's badge.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

Self Harm and Suicide

Instances of self harm or suicide on site will receive immediate medical support from suitably trained staff and parent/carer contact will be made. Any instances of significant self harm and all cases of attempted suicide will be referred to 101 or 999 as appropriate, in addition to the steps outlined above. The school's DSL and/or DDSLs will be immediately informed, along with the Headteacher as appropriate.

Further support is then identified on a case by case basis, led by the Pastoral Team. A Risk Assessment will be created with the student when they return to school, supported by parents/carers. This will identify any ongoing risk(s) and suitable measures to ensure student safety. Bag searches may be required for a period of time as part of risk assessment and safety planning procedures.

Non-collection of children and young people

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

- The student should report to reception
- Reception staff will contact parents and other name contacts
- If no contact has been made, regular attempts (every 10-15 minutes) will be made to make contact.
- Senior Pastoral staff, including DSLs and Deputies, will be informed
- Arrangements will be made for student to be supervised by members of staff
- A member of staff will continue to make attempts to contact parents. Should this not be possible, contact will be made with Children's Services and eventually the police.

Missing pupils

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

- Search the school site including toilets. This will include available pastoral, welfare and leadership staff.
- Inform DSL (or DDSL in their absence) that a child is missing
- Collate a full picture of the events leading up to the disappearance to ascertain whether there has been an issue earlier in the day and to be able to give a complete picture.
- Make a call to parents, - with a Police referral to 101 thereafter.
- Ensure that a complete picture is given to the police
- Check relevant CCTV camera positions
- Maintain contact with the parents and police bodies

Before and After School Activities and Contracted Services

Where the Local Governing Body transfers control or otherwise allows the use of school premises to external bodies (such as sports clubs) or service providers during or out of school hours, the LGB will ensure that these bodies or providers have appropriate safeguarding policies and procedures, and that there are arrangements in place to coordinate with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the bodies or providers.

Any allegation or safeguarding concern relating to an external organisation or individual using school premises must be reported to the DSL or Head of School and considered in line with local safeguarding procedures, including referral to the LADO where relevant.

Appendix 6: Local roles and contact details

Our DSL is Sophia Martinez. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the Deputies –will act as cover.

If the DSL and Deputies are not available, then the Head of School will act as cover.

Should there be a concern outside of school hours then social services should be contacted, the details are in the table below:

Role	Name	Contact Details
Designated Safeguarding Lead (DSL)	Sophia Martinez	smartinez@bohuntworkingham.com 0118 9076237 (term time only)
Deputy Designated Safeguarding Lead (DDSL)	Matthew Hulland	mhulland@bohuntworkingham.com
Deputy Designated Safeguarding Lead (DDSL)	Olly Woolley	owoolley@bohuntworkingham.com
Deputy Designated Safeguarding Lead (DDSL)	Neil Griffith	ngriffith@bohuntworkingham.com
Deputy Designated Safeguarding Lead (DDSL)	Alice Hurst	ahurst@bohuntworkingham.com
Deputy Designated Safeguarding Lead (DDSL)	Charity Ellis	cellis@bohuntworkingham.com
Deputy Designated Safeguarding Lead (DDSL)	Aaron Phillips	aphillips@bohuntworkingham.com
Deputy Designated Safeguarding Lead (DDSL)	Richard Fisher	rfisher@bohuntworkingham.com
Local Authority Designated Officer (LADO) and Deputies.	LADO@workingham.gov.uk	
Head of School	Jen Comber	head@bohuntworkingham.com
Designated Governor for Safeguarding (DSG)	Andrew Popple	apopple@bohuntworkingham.com

Chair of Local Governing Body (CoG)	Andrew Popple	apopple@bohuntwokingham.com
Referral and Assessment Team	0118 908 8002 triage@wokingham.gov.uk	
Police	101 or 999 (emergencies only)	
ARC Counselling Services	0118 977 6710	

Appendix 7: Mobile phones, cameras and images of children and young people

The use of digital images in schools is a complex area and all staff comply with Acceptable Use Policy and where applicable, Electronic Search Protocol.

Below is a brief summary of the key points extracted from the fuller relevant policies.

To comply with data protection legislation, informed consent must be given before images of pupils can be taken and used for promotional purposes.

Upon joining our school, the school will request informed consent from parents/guardians or students over 13 for the taking and use of images using Trust consent forms.

Only school devices will be used to take pictures and make recordings for promotional purposes. Photos & multimedia recordings will be used and stored in accordance with data protection legislation.

Staff, volunteers, specialist teachers/professionals and 1:1 tutors, and trustees and governors are allowed to bring their personal devices to school for their own use, but will limit such use to non-contact time when students are not present. Volunteers, specialist teachers/professionals and 1:1 tutors, trustees, governors, supply teachers and staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal devices.

Students will not be permitted to take pictures or recordings of any form of each other save with express staff permission on school site or offsite, on school activities/trips/visits.