Marches Academy Trust

Safeguarding and Child Protection Policy and Procedures

DOCUMENT CONTROL

Policy owner	Executive Team
Last updated	Autumn 2026
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Status	APPROVED
Date of approval	12.10.26
Summary of last revision	Autumn 2026 - Comprehensively updated to reflect Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, the Children's Wellbeing and Schools Act 2026, and revised local safeguarding arrangements. Key updates strengthen the Trust's safeguarding culture through new sections on Family Help and Shropshire's Family Help Together Framework (Sections 1, 3, 4, 10 and 17), a new Decision-Making Framework (Section 3), enhanced expectations around professional curiosity, lived experience, anti-discriminatory practice, equality and adultification bias (Sections 1, 5, 10 and 14), and expanded governance and leadership responsibilities including safeguarding assurance, filtering and monitoring reviews, cyber security and emerging technology risks (Section 5). New guidance has also been added on serious violence, contextual safeguarding, coercive control, child-to-parent abuse, kinship care, children in temporary accommodation, safeguarding babies and unborn children, and supporting children with medical conditions (Section 14), together with revised safeguarding training requirements and Family Help awareness for staff, DSLs, leaders, governors and trustees (Section 4).

	Significant operational updates have been made to safe practice, record keeping and safeguarding response procedures. These include strengthened requirements for alternative provision quality assurance (Section 6 and Appendix E), enhanced information-sharing and safeguarding record-management arrangements (Section 8), clearer guidance on disclosures and parental involvement (Section 9), expanded online safety and AI-related safeguarding risks, including deepfakes, AI-generated abuse and mobile-phone-free learning environments (Section 12), and substantially revised child-on-child abuse procedures covering misogyny, stalking, image-based abuse, serious violence and mandatory reporting readiness (Section 15). Further additions include strengthened arrangements for staff allegations and low-level concerns (Section 7), safeguarding responses to serious violence (Sections 8, 14 and 16), updated Operation Encompass and multi-agency working expectations (Section 10), and new health and safety provisions covering sport, toilets, changing facilities, residential visits and gender-questioning pupils (Section 19).
Related Policies	MAT Policies: • MAT Attendance Policy • MAT Behaviour Policy & Procedures (incorporating tackling bullying, inclusion, personal development, support, exclusions and use of reasonable force & physical intervention) • MAT GDPR Policy • MAT Health and Safety Policy • MAT ICT Policy • MAT Intimate Care Policy • MAT Relationship, Sex and Health Education Policy • MAT Recruitment & Selection Policy • MAT Special Educational Needs and Disabilities Policy • MAT Staff Code of Conduct Policy • MAT Supporting CYP with Medical Conditions Policy • MAT Educational Visits • MAT CYPwho are currently or Previously Looked After (P/CLA) • MAT Whistleblowing Policy • MAT Lettings Policy Other guidance: • Keeping children safe in education 2026: September 2026 • Working together to safeguard Children 2026 • Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership • What to do if you are worried a child is being abused 2015 - Advice for practitioners • DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people,parents and carers • Care and support statutory guidance issued under the Care Act 2014 • Children's Wellbeing and Schools Act 2026
Policy control survey	Please complete this survey and provide feedback if you have had to use this policy https://forms.office.com/r/HMeZtB29Si

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1 Safeguarding Statement

1.1 This policy applies to all staff, governors, trustees, volunteers, agency staff, contractors, visitors and anyone working on behalf of Marches Academy Trust. It is available on all school websites and upon request.

1.2 The policy aims to ensure that all schools within the Trust meet statutory safeguarding requirements, promote the welfare of children and young people and maintain effective safeguarding arrangements in accordance with Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and local safeguarding partnership procedures.

1.3 Trustees, Governors and staff across Marches Academy Trust (the Trust) fully recognise their contribution to safeguarding CYP (also used for child and young person: CYP). We believe that:

- i all CYP have the right to protection from all types of abuse, including neglect, exploitation, and/or harm.
- ii everyone has a responsibility to promote the welfare of all CYP, to keep them safe and to practice in a way that protects them.

1.4 This means that we will:

1.5 practice a culture of professional curiosity, professional vigilance, non-assumptive, non-biased practice, and openness.

1.6 not tolerate the abuse, neglect, exploitation and/or harm of CYP. This includes never accepting and always challenging or raising concerns about words or actions which downplay, justify, or promote abuse, neglect, exploitation, and/or harm, or precursory actions. This applies to anyone who is part of, comes into or works with all schools in our Trust.

1.7 be CYP-centred and ensure that we consider the best interests of CYP in everything that we do. This includes ensuring that we enable CYP's voices and experiences to be heard (using communication tools and advocacy if necessary); and that CYP are involved in and informed about the decisions being made about them.

i. ensure we provide a safe environment for CYP to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.

ii. look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse, neglect, exploitation, and/or harm of a CYP.

iii. ensure no CYP or group of CYP are treated less favourably than others.

iv. be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of CYP who we know are more vulnerable to experiencing abuse or discrimination.

1.8 work in partnership with our CYP and adults responsible for their care (referred to throughout as responsible adult(s), taken to mean those with parental responsibility[1]. A responsible adult is an individual aged 18 or over who has responsibility for the care, welfare, supervision, or safeguarding of a child, whether through parental responsibility, a formal caring role, or a delegated duty of care. Where the term is used **in this policy, it** includes parents, carers, guardians, foster carers, kinship carers, and other adults who are lawfully acting in the best interests of the child.

1.9 CYP includes everyone under the age of 18.

1.7.1 The Trust recognises that all CYP, regardless of who they are or where they are from have the right to protection from all types of abuse. No CYP or group of CYP in our Trust will be treated any less favourably than others in being able to access their right to education or other services and support. This may mean that additional positive actions and/or safeguards may be taken by us to ensure the individual and/or groups of CYP are not disadvantaged from receiving education or services or disproportionately subjected to abuse.

1.7.2 Safeguarding decisions will recognise and build upon CYP's strengths, resilience, protective relationships and wider support networks.

1.7.3 The Trust recognises that poverty, discrimination, disability, racism, adverse childhood experiences, culture, faith, identity and life circumstances can influence a child's experience of harm and access to support. Staff will actively consider these factors when assessing need, risk and protective factors.

1.10 **Vulnerable adults aged 18 and over.**

1.10.1 As a Trust, we offer post-16 education at some sites and as a result, there may be points in the academic year where adults are accessing education who are age 18 or older. Resultantly, this document applies to CYP under the age of 18.

1.10.2 Not all adults who attend education are vulnerable and as such, where an adult within education over the age of 18 divulges information or staff become concerned that they are at risk of harm, this policy is to be followed. The adult's wishes will be taken into account but will not determine the final decision to make a referral.

1.10.3 Where action is decided upon which necessitates contacting Adult Services, procedures will be followed as outlined within this policy, substituting 'Children's Services' for 'Adult Social Care Services.'

[1] S3 Children's Act 1989

1.10.4 The adult has a right to make their own decisions if they are competent to do so in line with the Mental capacity act 2005. If their competency is in doubt, further advice will be sought from the Safeguarding Team to the relevant local authority Adult social care department.

1.10.5 As the individual is an adult, there is generally no duty to inform a parent, carer, or other responsible adult(s) without the individual's consent, unless there is a legal basis or safeguarding justification to do so.

1.9 We recognise that discrimination, racism, bias and unequal treatment can negatively affect safeguarding outcomes for CYP. Staff will actively challenge discrimination, consider the impact of bias and disproportionality and ensure that safeguarding responses are equitable, inclusive and child centred.

1.10 All safeguarding practice across the Trust will reflect the principles of Shropshire's Family Help Together Framework- Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership We are committed to child-centred, relationship-based, restorative, trauma-informed and anti-discriminatory practice. We recognise that understanding the CYP's lived experience is central to effective safeguarding and promoting welfare.

2 Legislation, Standards and Guidance

2.1 This policy will have consideration for, and be compliant with, the following legislation, statutory guidance, and key information:

i. The Rehabilitation of Offenders Act 1974

ii. The Children's Act 1989 and 2004 amendment

iii. Section 3 (5) of the Children's Act 1989 states that the law empowers anyone who has care of a child to do all that is reasonable in the circumstances to safeguard his/her welfare.

iv. Human Rights Act, 1998

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

vi. Female Genital Mutilation Act 2003

vii. The National Responsible Carers Strategy 2008

viii. Equality Act 2010

ix. The Care Act 2014

x. The Child and Families Act 2014

xi. Counterterrorism and Security Act 2015

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

xiii. Serious Crime Act 2015

xiv. Children's and Social Work Act 2017

xv. Data protection: The UK's data protection legislation - GOV.UK

xvi. The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

xvii. The Ofsted Compulsory Childcare Register 2020 with update 2025 Apply to join the Childcare Register (CR1) - GOV.UK

xviii. Domestic Abuse Act 2021

xix. Education and Training (Welfare of Children) Act 2021

xx. The Public Sector Equality Duty (PSED) 2022, which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve CYP outcomes. Some CYP may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

xxi. School Suspensions and Permanent Exclusions 2023

xxii. Online Safety Act - GOV.UK

xxiii. DfE Data Protection Guidance 2023

xxiv. Information Sharing Advice for Safeguarding Practitioners-

xxv. Data (Use and Access) Act 2025

xxvi. EYFS statutory framework for group and school-based providers 2025

xxvii. Terrorism (Protection of Premises) Act 2025 ('Martyn's Law')

xxviii. Unpaid Carers action plan: recognise, refer, reach - GOV.UK 2026

xxix. Keeping Children Safe in Education - GOV.UK 2026

xxx. Working together to safeguard Children 2026

xxiii. UN Convention on the Rights of the Child Articles 28 and 29

xxiv. Terrorism (Protection of Premises) Act 2025 (Martyn's Law)

2.2 Local procedures

i. Shropshire Safeguarding Community Partnership Allegations about staff/volunteers protocol (LADO)

ii. Shropshire Safeguarding Community Partnership

iii. West Midlands Safeguarding Procedures

iv. Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership

2.3 **This policy and procedure will also link to other setting/school policies & procedures:**

i. MAT Attendance Policy
ii. MAT Behaviour Policy & Procedures (incorporating tackling bullying, inclusion, personal development, support, exclusions and use of reasonable force & physical intervention)
iii. MAT GDPR Policy
iv. MAT Health and Safety Policy
v. MAT ICT Policy
vi. MAT Intimate Care Policy
vii. MAT Relationship, Sex and Health Education Policy
viii. MAT Recruitment & Selection Policy
ix. MAT Special Educational Needs and Disabilities Policy
x. MAT Staff Code of Conduct Policy
xi. MAT Supporting CYP with Medical Conditions Policy
xii. MAT Educational Visits
xiii. MAT Children Looked After, Previously Looked After and Care Experienced Policy
xiv. MAT Whistleblowing Policy
xv. MAT Lettings Policy

3 Definitions

3.1 **Safeguarding and promoting the welfare of CYP is defined as:**

i. providing help and support to meet the needs of child as soon as problems emerge

ii. protecting children from maltreatment, whether that is within or outside the home, including online

iii. preventing impairment of children's mental and physical health or development

iv. ensuring that children grow up in circumstances consistent with the provision of safe and effective care

v. 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

vi. taking action to enable all children to have the best outcomes.

3.2 **Safeguarding vulnerable adults (see 1.8) is defined in the Care and Support Statutory Guidance issued under the Care Act 2014 as:**

i. protecting the rights of adults to live in safety, free from abuse and neglect

ii. people and organisations working together to prevent and stop both the risks and experiences of abuse and neglect

iii. people and organisations making sure that adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action

iv. recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.

3.3 **Child protection is part of this definition and refers to activities undertaken to prevent CYP suffering, or being likely to suffer, significant harm.**

3.4 Abuse is a form of maltreatment of a CYP and may involve inflicting harm or failing to act to prevent harm. Keeping children safe in education 2026: September 2026, Part 1 and Annex B, explains the different types of abuse and their signs and indicators.

3.5 Neglect is a form of abuse and is the persistent failure to meet a CYP's basic physical and/or psychological needs, likely to result in the serious impairment of the CYP's health or development. Keeping Children Safe in Education 2026 (comes into force on 1 September 2026), Part 1 and Annex B, defines neglect in more detail. Keeping children safe in education 2026: September 2026

3.6 The following three safeguarding partners are identified in Keeping children safe in education 2026: September 2026: (and defined in the Children's Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local CYP, including identifying and responding to their needs:

i. The Local Authority (LA)

ii. An integrated care board for an area within the LA

iii. The chief officer of police for a police area in the LA area

3.7 Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the CYP involved feels most comfortable with.

3.8 Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of CYP) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

3.9 Family Help is a whole-family approach which recognises that CYP's outcomes are closely linked to the strengths, needs and circumstances of the wider family network. Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership

3.9.1 Family Help aims to provide the right support at the right time to prevent problems escalating and may involve multi-agency assessment and planning including:

i. school's role in identifying emerging need

ii. participation in Family Help assessments

iii. lead practitioner arrangements

iv. attendance at Team Around the Family meetings

v. escalation when needs increase

3.9.2 CYP's lived experience is the day-to-day reality and experience of family life, relationships, education, safety, health and wellbeing. Understanding what life is like for a CYP is fundamental to assessment, decision-making and safeguarding practice.

3.9.3 Early intervention should be considered where a CYP displays emerging abusive, violent, harmful, controlling or coercive behaviours.

3.10 Decision Making Framework

3.10.1 Safeguarding decisions will be informed by consideration of:

i. frequency and duration of concerns

ii. severity of concerns

iii. impact upon the CYP's safety, wellbeing and development

iv. safeguarding risk

3.10.2 Staff will consider cumulative harm, recognising that concerns which appear low level in isolation may have significant impact when viewed collectively over time.

3.10.3 Strengths and protective factors should always be considered alongside risk.

4 Professional Development and Support

4.1 When staff join the Trust, they will be informed of the safeguarding CYP arrangements in place and the information and photographs of the Designated Safeguarding Lead (hereafter referred to as DSL) and Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSLs; collectively both DSL and DDSL will be referenced as D/DSL).

4.2 All staff and volunteers will complete an induction programme which includes basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a CYP, and how to record a concern about the welfare of a CYP.

4.3 To ensure all our staff (including volunteers) and governors are knowledgeable and confident in keeping CYP safe in our schools, they will complete the professional development activities as outlined below. We monitor professional development activities and maintain central professional development records in our schools.

4.4 The D/DSLs provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, development, and performance processes in school. The D/DSL receive regular support and formal supervision in each school, both internally and externally (the latter for identified key staff).

4.5 All Staff (including volunteers)

Activity	Frequency
All staff will receive safeguarding information and training in accordance with KCSIE 2026, including the requirements set out within Part One, paragraphs 11-17, and will be made aware of the school's safeguarding arrangements, systems, policies and procedures. Keeping children safe in education 2026: September 2026	Induction then annually, and when arrangements/procedures are updated
Read Keeping children safe in education 2026: September 2026: **All staff (including those who do not work directly with children):** Part One of *Keeping Children Safe in Education 2026*. **Designated Safeguarding Leads, Deputy Designated Safeguarding Leads, Headteachers and senior leaders:** *Keeping Children Safe in Education 2026* in its entirety. **Staff working within the Early Years Foundation Stage:** the relevant safeguarding and welfare requirements of the *EYFS Statutory Framework*, in addition to KCSIE 2026.	Induction then annually (in Autumn Term) or when updated
Family Help Framework - All staff awareness Family Help Together - A Framework for Action – Shropshire Safeguarding Community Partnership	Annual update for all staff though September PD Day update
Complete Safeguarding Awareness Training (specific to local area, i.e., SSCP's Raising Awareness, delivered by trained trainers) to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns including FGM, Serious violence indicators and local Family Help arrangements	Induction and PD Day annual update and then every 3 years
Complete Prevent Awareness Training appropriate to role (Prevent Duty Training)	Induction and every 2 years with updates in the interim

Activity	Frequency
▪ **All Staff:** Course 1 ▪ **Middle, Senior Leaders & Pastoral:** Course 1 & 2 ▪ **Safeguarding Staff:** Courses 1, 2 & 3	
Complete Cyber Security Training (provided by MAT ICT) Cyber security training for school staff - NCSC.GOV.UK	Induction and then as directed
Receive regular national and local safeguarding updates including digital safeguarding, online filtering and monitoring, and safe/ethical use of AI	Through Trust Update and via D/DSLs within school-based briefings, staff training, bulletins, on a weekly basis

4.6 Designated Safeguarding Lead & Deputy Designated Safeguarding Lead(s) – D/DSL

4.6.1 All Deputy Designated Safeguarding Leads will complete the same DSL safeguarding training as the Designated Safeguarding Lead and undertake annual updates to ensure they can fulfil the role when required.

Activity (in addition to all staff above)	**Frequency**
Complete Designated Safeguarding Lead (DSL) training in accordance with the requirements set out in Keeping Children Safe in Education 2026, including Part Two and Annex B (Role of the Designated Safeguarding Lead). Keeping children safe in education 2026: September 2026	On induction into role and then every 2 years
Read Keeping children safe in education 2026: September 2026in its entirety.	Induction into role then annually (in Summer Term) or when updated
Families First Partnership Framework DSLs, DDSLs, pastoral staff, SENDCOs, attendance leads and senior leaders. Family Help Together – A Framework for Action training to ensure DSL staff understand the levels of need, Family Help arrangements, referral pathways, escalation procedures and statutory intervention	Detailed DSL training every 2 years plus updates- Safeguarding briefing and DSL network sessions

thresholds. This training will be refreshed in line with local safeguarding partnership requirements.	
Maintain knowledge and development relating to the role of DSL (including, but not limited to regular Family Help training and Brook Traffic Light Tool training)	As required, but at least annually. All Safeguarding Staff must be able to access and use Family Help tools as set out by the Local Authority.
Operation Encompass Training offer Operation Encompass (Domestic Abuse) | Shropshire Learning Gateway	Annual update and whenever local procedures change

4.7 **All Governors and Trustees**

Activity	Frequency
Complete Governor Safeguarding Training to equip them with the knowledge to carry out their strategic Roles and Responsibilities.	Induction and then every 3 years
Read Keeping children safe in education 2026: September 2026 ▪ **All Governors:** Part One: Safeguarding Information for All Staff, Annex C- Changes ▪ **Safeguarding Governors:** Part Two: The management of Safeguarding, Annex B: The role of the DSL, Annex C- Changes	Induction into role then annually (in Autumn Term or when updated)
Complete Cyber Security Training (provided by MAT ICT) Cyber security training for school staff - NCSC.GOV.UK	Induction and then annually
Complete Prevent Awareness Training appropriate to role Prevent Duty Training) ▪ **All Governors:** Course 1 ▪ **Chair & Safeguarding Link Governors:** Courses 1 & 2	Induction and every 2 years

4.8 **Staff/Governors/Trustees involved in recruitment of staff (including administration)**

Activity (in addition to other relevant above)	**Frequency**
Read Part 3: Keeping children safe in education 2026: September 2026	Induction into role then annually (in Autumn Term or when updated)
Complete appropriate safer recruitment training (that is in alignment with Part 3 Keeping children safe in education 2026: September 2026	Induction and every 3 years (or when Keeping children safe in education 2026: September 2026: Part 3 is updated)

4.9 All staff will wear appropriate name badges within school and all visitors will sign into school for each visit. Staff with completed DBS (Disclosure and Barring Service) checks will wear grey lanyards whereas visitors, i.e., Supply Staff will wear a black lanyard that differentiates them from employed staff but confirms their completed DBS; staff without a completed DBS check will wear red lanyards and will be accompanied onsite at all times.

4.10 All staff will be given access to copies of relevant policies and training to help them understand the systems and processes within Trust schools which support safeguarding and the procedures they must follow if they suspect abuse, neglect, exploitation, and/or harm. Relevant procedures include:

i. MAT Attendance Policy and Procedures with school-specific appendices (published on schools' respective websites)

ii. MAT Safeguarding and Child Protection Policy and Procedures with school-specific appendices (published on schools' respective websites)

iii. MAT Behaviour Policy & Procedures (incorporating tackling bullying, inclusion, personal development, support, exclusions and use of reasonable force & physical intervention) with school-specific appendices (published on schools' respective websites)

iv. MAT Staff Code of Conduct

v. LA Procedures for Managing Children Missing Education

4.11 This policy is available via each Trust school's website, and this policy and practice complements other policies concerned with CYP's wellbeing in the Trust.

5 Roles and Responsibilities

5.1 We follow the statutory guidance as set out in the latest Keeping Children Safe in Education Keeping children safe in education 2026: September 2026 (and associated documents and guidance), adhering to the roles and responsibilities and expectations identified for:

5.2 The Trust's Board of Trustees and Local Governing Bodies (LGB)

5.2.1 Have a strategic leadership responsibility for ensuring we take a whole Trust/school approach to safeguarding arrangements as outlined in this policy and that we comply with our duties under Legislation, Standards and Guidance. Part 2 of Keeping Children Safe in Education 2026 outlines their key responsibilities.

5.2.2 The Safeguarding Governor/Trustee is responsible for leading on the governance oversight of safeguarding arrangements; regularly meeting with the Designated Safeguarding Lead (at least termly) and reporting back to the Local Governing Body via LGB Meetings.

5.2.3 The Chair of the Governing Body will liaise with the Local Authority in the event of an allegation of abuse made against the Headteacher in line with Ensuring Safe Staff.

5.2.4 All Governors/Trustees will ensure:

i. the school has a DSL who has the appropriate status and authority to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.

ii. the Trust, and all its schools, have safeguarding and linked policies, and individualised procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with our duties under Legislation, Standards and Guidance at all times.

iii. all staff and governors are knowledgeable and confident in carrying out their safeguarding duties in line with Professional Development and Support, not limited to only the Safeguarding Link Governor and Chair of Governors.

iv. that the effectiveness and implementation of safeguarding arrangements are robustly overseen by the school's DSL, and quality assured by the Trust's Designated Safeguarding Lead as outlined in the Safeguarding Assurance Document.

v. schools ensure that the effectiveness of filtering and monitoring systems is reviewed at least once every academic year. Trustees and Governors

receive assurance regarding the outcomes of these reviews and any actions arising.

vi. schools provide assurance that DSL cover arrangements remain effective and that safeguarding concerns can be responded to immediately during periods of staff absence.

5.3 Trustees and Governors will receive regular safeguarding assurance reports to enable them to fulfil their statutory safeguarding responsibilities and provide effective strategic challenge. These reports will include assurance regarding the effectiveness of safeguarding arrangements, the outcomes of the annual review of filtering and monitoring systems, significant safeguarding trends and emerging risks, allegations and low-level concerns (appropriately anonymised where necessary), online safety arrangements, cyber security considerations, safer recruitment compliance, safeguarding training, and risks associated with artificial intelligence, deepfakes and other emerging technologies.

5.4 **The Headteacher**

Is responsible (with the support of the DSL) for ensuring safeguarding arrangements are implemented effectively in school. This includes:

5.4.1 having the overarching responsibility of ensuring the effectiveness of school safeguarding arrangements as outlined in this policy and individualised procedures.

5.4.2 being accountable and reporting to the Governing Body (with the support of the DSL) on the effectiveness of school safeguarding arrangements. This includes reviewing qualitative information and quantitative data to identify areas for improvement and outlining effective solutions; this should include the close working of the D/DSL with those responsible for Relationship, Sex, and Education (RSE), and Personal, Social, Health and Economic (PSHE) Education to develop proactive responses to areas for development.

5.4.3 supporting and promoting a whole school safeguarding culture and ethos as outlined in our safeguarding statement and the Trust's Learning for Life Framework. This includes ensuring that the Senior Leadership Team work effectively together and with the DSL, to ensure a whole school approach to safeguarding.

5.4.4 take the lead role in ensuring safe practice; including ensuring staff are knowledgeable and confident in their safeguarding practice; including ensuring that practice is in line with national and local requirements. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liaising with the Local Authority Designated Officer (LADO) with the support of the DSL

or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.

5.4.5 ensuring that school policies relating to site safety and health and safety are in place, implemented and followed by all staff.

5.4.6 where the school educates those in Early Years, ensure the requirements set out regarding safer eating and paediatric first aid in the EYFS statutory framework are implemented and followed.

5.4.7 enabling the D/DSLs carry out their roles effectively. This means ensuring sufficient resources and time are allocated to enable the D/DSLs and other identified staff, to discharge their responsibilities, including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of CYP, to be appropriately trained, and afforded appropriate supervision.

5.4.8 all staff and volunteers practice a culture of professional curiosity, professional vigilance, non-assumptive, non-biased practice, and openness, and therefore feel able to raise their concerns about poor and unsafe practice with regard to CYP, and that such concerns are addressed in a timely manner, in accordance with agreed policies. This includes training staff on how to raise low-level and significant concerns about the conduct or professionalism of colleagues, and a clear system for logging and reviewing concerns raised overtime.

5.4.9 ensuring that all school policies including safeguarding policies and procedures, and others required to be in place, are implemented and followed by all staff.

5.4.10 a list of all staff and volunteers, and their safeguarding training dates, is maintained and reviewed regularly.

5.4.11 ensuring the DSL represents the school at relevant multi-agency safeguarding meetings, including Child Protection Conferences, Child in Need Reviews, Family Help Meetings, Strategy Discussions, Team Around the Family meetings and other safeguarding forums. Where the DSL is unavailable the Headteacher will ensure a suitably trained Deputy DSL will attend and act on behalf of the school. Time and resources will be made available to enable effective participation and follow-up actions arising from such meetings

5.4.12 ensuring the Local Authority is notified of significant events and major changes in accordance with the Shropshire Council Protocol for Notifying the Local Authority of Significant Events and Changes.

5.5 The Designated Safeguarding Lead (DSL)

Takes the lead responsibility for safeguarding and child protection in our schools. Keeping children safe in education 2026: September 2026 Annex C of outlines their key responsibilities. All DDSLs support the DSL in the discharge of their responsibilities. Responsibilities include:

5.5.1 ensuring that the school has school-specific individualised procedures in place to complement this policy, and that both are implemented and followed by all staff. These must be shared with staff and made available in school-specific appendices.

5.5.2 ensuring safeguarding arrangements are in place for activities taking place outside normal school hours and during extended school provision.

5.5.3 acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and outside of school.

5.5.4 supporting the Headteacher to ensure safe practice in school.

5.5.5 managing safeguarding referrals to the LA, Police and any other statutory authorities or multi-agency risk management arrangements.

5.5.6 5working closely with the LGB, Headteacher and relevant Senior Leadership Team members to ensure a whole school safeguarding culture and ethos as outlined in our safeguarding statement and the implementation of effective safeguarding arrangements, as outlined in this policy and individualised procedures.

5.5.7 acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership arrangements.

5.5.8 ensuring CYP and their responsible adult(s) are encouraged to raise safeguarding concerns, know how to do so, and know how concerns will be responded to, as outlined in the individualised school-specific procedures.

5.5.9 acting as a source of support, advice, and expertise to all staff including ensuring that there is ongoing promotion and awareness of safeguarding and Child Protection in school. This specifically includes working with those responsible for Relationship, Sex, and Education (RSE), and Personal, Social, Health and Economic (PSHE) Education to develop proactive responses to areas for development.

5.5.10 working closely with the school's EDIB Lead to ensure they are up to date on practice with regards to equity, equality, diversity, inclusion and belonging, and

can support and lead investigations into alleged hate crimes against the protected characteristics, confidently and impartially. This includes tracking, analysing and reporting instances of alleged hate crime(s) and the subsequent outcomes, including necessary and appropriate learning and adaptations to practice.

5.5.11 consider use of local authority hate incident reporting procedures where behaviour is perceived to be motivated by hostility or prejudice based on protected characteristics.

5.5.12 ensuring the effective management and oversight of safeguarding information as outlined in Record Keeping and Information Security.

5.5.13 maintaining and developing professional development and support.

5.5.14 ensuring robust safeguarding cover arrangements exist at all times, including during periods of absence. Schools will maintain clear contingency arrangements and shared safeguarding communication systems where appropriate.

5.5.15 coordinating early intervention support and actively participate in Family Help meetings. They will contribute relevant information, support assessment of need, participate in action planning and monitor agreed outcomes.

5.5.16 ensuring staff understand the distinction between school-based support, Family Help arrangements and statutory safeguarding intervention thresholds and will support effective multi-agency working.

5.5.17 monitoring of safeguarding data for evidence of disproportionality, discrimination or unequal outcomes and act where necessary.

5.5.18 ensuring safeguarding practice reflects the Shropshire Blended Practice Model using relationship-based practice, restorative practice, trauma-informed practice and safe uncertainty.

5.5.19 ensuring that safeguarding decisions are informed by the CYP's lived experience and supported by evidence, supervision and multi-agency discussion where appropriate.

5.6 Senior Leadership, additional to Headteacher and DSL

5.6.1 Senior leaders share collective responsibility for safeguarding and promoting the welfare of children. Safeguarding is everyone's responsibility; however, senior leaders are expected to provide visible leadership, appropriate challenge, robust oversight and strategic direction to ensure that safeguarding remains effective across all aspects of the school's provision.

5.6.2 Members of the Senior Leadership Team will:

i. promote and model a strong culture of safeguarding and CYP -centred practice throughout the school.

ii. ensure safeguarding remains a standing priority within strategic planning, school improvement activity and quality assurance processes.

iii. support the Designated Safeguarding Lead in the implementation, monitoring and evaluation of safeguarding arrangements.

iv. ensure that all staff receive safeguarding updates, training and support appropriate to their role and maintain an awareness of emerging safeguarding risks.

v. Promote professional curiosity and ensure that concerns about the welfare of CYP are identified, discussed, challenged and acted upon promptly.

vi. provide effective professional challenge where safeguarding practice, decision-making or outcomes for CYP require further scrutiny.

vii. monitor the attendance, behaviour, welfare and progress of vulnerable CYP, including CYP with a social worker, CYP receiving Family Help, looked after and previously looked after CYP, CYP in kinship care and CYP with SEND.

viii. ensure safeguarding themes, trends and lessons learned are regularly reviewed and inform school improvement priorities.

ix. oversee the effectiveness of online safety arrangements, including filtering and monitoring systems, and ensure concerns are escalated in line with safeguarding procedures.

x. support staff to understand and respond appropriately to online harms, harmful sexual behaviour, misogyny, child-on-child abuse, exploitation, serious violence, radicalisation and emerging safeguarding risks.

xi. ensure that safeguarding considerations are embedded within curriculum, attendance, behaviour, SEND, inclusion and alternative provision arrangements.

xii. work collaboratively with external agencies and partners to secure the best outcomes for CYP and families.

xiii. participate in safeguarding audits, reviews and quality assurance activities and ensure that identified actions are completed within agreed timescales.

xiv. ensure concerns relating to low-level concerns, allegations against staff, whistleblowing and staff conduct are managed in accordance with Trust procedures.

xv. understand the safeguarding implications of emerging technologies, including artificial intelligence (AI), manipulated or deepfake content, and support staff in responding appropriately to associated risks.

xvi. maintain an active oversight of safeguarding data and reporting to identify vulnerable groups, trends, patterns and areas requiring intervention.

5.7 All staff (including students and volunteers):

5.7.1 are expected to work in line with our safeguarding statement and adhere to the policies, processes and systems that support safeguarding as outlined in this policy and procedures. This specifically includes:

i. accessing and maintaining professional development and support to ensure they remain knowledgeable and confident in their safeguarding practice.

ii. recognise, Respond and Report as per Staff Safeguarding Concerns.

iii. engaging in safe practice. This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of CYP as outlined in Ensuring Safe, Staff teaching our CYP how to keep safe.

iv. Will remain alert to AI-generated content, manipulated imagery, deepfake material, impersonation, online grooming and coercion facilitated through artificial intelligence technologies.

5.8 Shropshire Blended Practice Model

5.8.1 The Trust adopts the principles of the Shropshire Blended Practice Model using:

i. Relationship-Based Practice- Staff build trusted relationships, seek to understand the CYP's lived experience and keep the CYP's voice central to all decision-making.

ii. Restorative Practice- Staff will work collaboratively with families wherever possible, using respectful challenge, shared problem-solving and openness regarding concerns and expectations.

iii. Trauma-Informed Practice- Staff will recognise the impact of trauma, adversity, abuse, discrimination and stress upon CYP and families and seek to reduce shame, blame and barriers to engagement.

iv. Safe Uncertainty- Staff will remain professionally curious and ask: What do we know? What do we not know? What do we need to check?

5.5.2 Decision-making will be evidence-informed and subject to appropriate challenge and review.

6 Ensuring Safe Practice

6.1 Safer recruitment

6.1.1 We adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with CYP from applying for or securing employment or volunteering opportunities in our setting. All staff/governors involved in recruitment complete additional safer recruitment training as outlined in Professional Development and Support. Our recruitment procedures are outlined in MAT Safer Recruitment and are in alignment with Keeping Children Safe in Education 2026 Keeping children safe in education 2026: September 2026**:** Part 3 and where applicable (primary-phase settings, EYFS statutory framework part 3.

6.1.2 As part of our recruitment and selection processes, we ensure that our commitment to safeguarding and promoting the welfare of CYP is evident to candidates throughout each stage of the process, with any candidate who is not suitable to work with CYP being deterred and identified at the earliest point. This policy is included in the application information for candidates. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks prior to interview as well as ensuring that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

6.1.3 In accordance with Keeping Children Safe in Education 2026: Keeping children safe in education 2026: September 2026 Part 3, we maintain a record of information we have received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students); Governors/Trustees; contractors; and visitors who attend our schools in a professional capacity. We complete the checks on staff, volunteers, and Governors/Trustees who we recruit ourselves. For those who are recruited by others, we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with CYP.

6.1.4 All schools keep a single central record that, as a minimum, evidences the following:

i. all staff have been employed in compliance with safer recruitment requirements (Part Three: Safer Recruitment: KCSIE, 2026).

ii. date of employment.

iii. identity and address confirmed, with date.

iv. qualifications checked, with date.

v. references checked, with date.

vi. prohibition from teaching check, with date (for teaching staff).

vii. Section 128 prohibition check, with date.

viii. barred list check, with date.

ix. Enhanced Disclosure and Barring Service (DBS) check, with date.

x. right to work in the UK, with date.

xi. checks confirmed by, and date.

6.1.5 We comply with the Safeguarding and Welfare Requirements in the Statutory Framework for the Early Years Foundation Stage (EYFS) 2025- Early years foundation stage (EYFS) statutory framework - GOV.UK, the Compulsory Childcare Register, and Keeping Children Safe in Education 2026 Keeping children safe in education 2026: September 2026 in respect to references and Enhanced Disclosure and Barring Service checks for staff and volunteers to ensure that no disqualified or unsuitable person works with or has access to the CYP.

6.1.6 Where we do not have all the necessary information or there are gaps in the information, we have robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability does not work unsupervised or engage in regulated activity with CYP. We reserve the right to refuse access to the school site to any person who we are not assured is safe to work or engage in regulated activity with CYP.

6.1.7 On appointment, staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of school. Please see Professional Development and Support.

6.1.8 When any safeguarding concerns of allegations arise relating to a member of staff, Governor/Trustee or other person working on our school premises, staff

are expected to act in line with Ensuring Safe Staff and Staff Safeguarding Concerns: Recognise, Respond, Report.

6.1.9 In accordance with KCSIE 2026, all volunteers engaged in regulated activity will be subject to the appropriate enhanced DBS and children's barred list checks irrespective of whether they are supervised.

6.2 Contractors

6.2.1 We have several contracts with external providers to work in our school including with CYP. We have stringent processes in place to ensure that all necessary checks are completed and recorded on schools' Single Central Record (as outlined in Ensuring Safe Practice).

6.3 Visitors

6.3.1 We have procedures for recording the details and confirming the identity of visitors, including prospective candidates. We ensure that we have control over who comes into the premises so that no unauthorised person has **unsupervised** access to CYP. All arranged for visitors coming into Trust schools and entering school premises are outlined in the MAT Safer Visiting Policy.

6.3.2 All visitors to our school are expected to act in accordance with our Safeguarding Statement. When external speakers or visitors attend our school premises (whether for school or non-school activities), we conduct due diligence checks to ensure that their views and delivery of material continues to ensure our school is a safe place. This continues to ensure we are teaching our CYP how to keep safe, as well as promoting fundamental British Values and community cohesion (please also see Preventing Radicalisation).

6.3.3 All visitors to the school delivering presentations, assemblies, educational content or similar will be expected to follow the arrangements as set out in the MAT Safer Visiting Policy (appendices).

6.4 Work experience (KS4 and KS5 only)

6.4.1 We have processes in place to ensure that individuals or companies who provide work experience placements for our CYP have appropriate safeguarding policies and procedures in place. We ensure that any adults who are supervising CYP on work experience have the appropriate checks carried out as required by Keeping Children Safe in Education 2026: Keeping children safe in education 2026: September 2026: Part 4: Adults who supervise Children on work experience.

6.4.2 If a CYP's work experience placement is in a specified place where regulated activity is carried out (such as an education or childcare setting), we will work with the provider to ensure that the appropriate checks and/or risk assessments are carried out.

6.4.3 All schools operating work experience have a specific Careers Policy which outlines the process, preparation and protocols including how CYP are made aware of the behaviour expected, the adults supervising them, and how, and to whom, to raise any concerns.

6.5 Use of school premises for non-school activities

6.5.1 When schools have arranged extra-curricular activities out of school hours which are under the direct supervision or management of school staff, this safeguarding policy is to be followed and any concerns should be managed in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response.

6.5.2 We will follow our Ensuring Safe Staff procedures if we become aware of any allegations relating to an organisation or individual using our school premises.

6.5.3 Where we have sessions or activities which are provided by another person or organisation that is using the school site and not during school time or under direct supervision, we seek assurances that they have the required child safeguarding arrangements in place as an individual/organisation as outlined in Out-of-school settings: safeguarding guidance for providers - GOV.UK and visitors. This is regardless of whether CYP who are on roll at our school access the activity or not.

6.5.4 The arrangements for this will be set out within any transfer of control agreement, (i.e., lease or hire agreement), and failure to comply with these arrangements will lead to termination of the agreement.

6.6 Alternative provision

6.6.1 The cohort of CYP in Alternative Provision often have complex needs, and we are aware of the additional risk of harm that CYP accessing alternative provision may be vulnerable to.

6.6.2 Ensure all Quality Assurance checks are completed in line with Arranging Alternative Provision - guide for LAs and schools by MATi staff and recorded centrally for schools to access documentation. General | AP Quality Assurance_MMAT This will be carried out yearly followed by termly for updates.

6.6.3 Quality Assurance visits will be consistent carried out by MATi staff using Appendix E - Alternative Provision Quality Assurance Checklist BLANK.docx

6.6.4 Where schools place a CYP with an alternative provision provider, they continue to be responsible for their safety and welfare and are satisfied that the provider can meet the needs of the CYP. Schools do this by:

i. recording the CYP on the Wave as per the Learning for Life Framework and tracking all activity on the CYP's Arbor profile. AP Steps for Schools Final Version.docx

ii. ensuring all documentation including risk assessments, profiles, referrals (including for ECHNA or BeeU), Reduced Timetables, etc., are completed, recorded centrally and reviewed as per specific guidelines. General | AP Quality Assurance_MMAT

iii. establishing clear communication channels between school and the alternative provision providers to allow daily attendance logs, and regular updates regarding progress and wellbeing to be shared.

iv. monitoring attendance including daily tracking and the utilisation of the appropriate attendance codes as per Working together to improve school attendance: July 2026

v. scheduling regular reviews (at least half-termly) with the intention always focussed on a return to a school setting, whether that is the home school, a different school, or a specialist school.

vi. evaluating the effectiveness of the Alternative Provision through progress tracking (at least half-termly) and assessments regarding health and safety, safeguarding and achievement, academic and developmental.

vii. engaging responsible adult(s) and working with the CYP to ensure the provision meets their needs, and action plans are followed.

viii. intervening when Alternative Provision is not meeting a CYP's needs and utilising school-based support to allow it to be successful.

ix. maintaining appropriate records.

x. delivering training for staff to allow a CYP to successfully return to school after a placement at Alternative Provision.

xi. collaborating with multi-agencies to allow a period of education at an Alternative Provision to be successful, and the return sustainable.

xii. prior to placement commencing, ensure safeguarding risks are assessed, information shared appropriately and support plans implemented where necessary.

6.6.5 We obtain written confirmation (at least annually, and at any point such checks require updates, i.e., policy/training expiration dates) from the alternative provision provider that appropriate safeguarding checks have been conducted on

individuals working at the establishment, i.e., those checks that the school would otherwise perform in respect of its own staff.

6.6.6 Written confirmation of safeguarding checks completed by alternative providers will be obtained before placement commences and reviewed periodically throughout placement. Appendix E - Alternative Provision Quality Assurance Checklist BLANK.docx

6.6.7 The school will remain responsible for safeguarding and educational outcomes while a pupil attends Alternative Provision.

6.6.8 Where alternative providers maintain safeguarding records relating to a Trust CYP, arrangements will be in place for regular safeguarding information sharing between the provider and the commissioning school. Both settings will maintain appropriate records of actions taken and safeguarding concerns identified.

7 Ensuring Safe Staff

7.1 We promote an open and transparent culture in which all concerns about the behaviour or conduct of any adults working in, at or on behalf of the school are dealt with appropriately.

7.2 There are two levels of allegations or concerns:

7.3 Allegations that may meet the harm threshold

7.3.1 Circumstances where someone working within the school has or may have:

i. behaved in a way that has or may have harmed a CYP, and/or

ii. possibly committed a criminal offence against or related to a CYP, or

iii. behaved towards CYP in a way that indicates that they would pose a risk of harm to CYP or young people, or

iv. behaved or may have behaved in a way that indicates they may not be suitable to work with CYP. This includes any behaviour that may have occurred outside of the school that could pose a transferable risk.

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

7.3.3 If the allegation relates to the Headteacher, this should be immediately verbally reported to the Chair of Governors. Staff may be required to provide a written statement at the request of the Chair of Governors.

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

In most cases, the Headteacher (or the Chair of Governors) will lead on managing allegations with the support of the Human Resources Department, the DSL and the Trust DSL. They will ensure that Part 4 Keeping children safe in education 2026: September 2026 and Shropshire Safeguarding Community Partnership Managing Allegations Procedures are applied. Any allegations that meet the above criteria will be referred to the Local Authority Designated Officer within one working day and we will follow their advice and guidance.

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

involved. We also have a duty of care towards our staff, and we will provide a named contact for the staff member.

7.3.6 If necessary, we will adhere to our legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Part 3 Keeping Children Safe in Education 2026 Keeping children safe in education 2026: September 2026 if the criteria for such reporting is met.

7.3.7 Primary Settings with nurseries only: we will notify OFSTED as soon as reasonably practical and within 14 days of the allegation first being made, informing them of action taken by completing the online form.

7.4 Allegations / concerns that do not meet the harms threshold (Low level concerns)

7.4.1 The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteers may have acted in a way that:

i. is inconsistent with the MAT Staff Code of Conduct Policy, including inappropriate conduct outside of the workplace

ii. does not meet the harm threshold as 7.1 above.

7.4.2 Low level concerns should be reported in person to the Headteacher to embed our culture of openness and transparency, and to ensure that our schools' values and expected behaviours are lived, monitored, and reinforced by all staff. If the Headteacher is not available, the DSL should be informed. Patterns of low-level concerns will be reviewed collectively to identify whether concerns indicate unsafe culture, unsafe practice or escalating risk.

7.4.3 The Headteacher will decide the outcome of all low-level concerns (in consultation with the DSL if necessary) raised in line with this policy, and the MAT Staff Code of Conduct Policy. Consideration will be given to whether there is a pattern of behaviour by the individual, or if there is a wider school culture issue, and if policies need to be revised, or if all staff guidance or additional staff training is required.

7.4.4 Where the concern is about the Headteacher, the Executive Link for the school (a member of the Executive Team employed within Marches Academy Trust) or the Trust DSL must be notified directly. The concern will be reviewed as per 7.4.3 and decision made as to the appropriate outcome, including whether to raise this with the Chair of Governors as a safeguarding issue (7.3) or conduct issue as per MAT Code of Conduct Policy. Such concerns will be logged centrally with the Trust Safeguarding team.

7.4.5 Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the school's

arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of children. If staff have such concerns, these should be raised to the Headteacher or refer to the MAT Whistleblowing Policy. If staff feel unable to raise concerns with the school directly, they can contact NSPCC Whistleblowing Advice Line.

7.4.6 Where home visits are undertaken, staff will act in accordance with the Trust procedures and safer working practice guidance. Appropriate risk assessments will be completed and safeguarding considerations will be reviewed before any visit takes place.

8 Record Keeping and Information Security

8.1 We have a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We have data protection processes in place to ensure that we keep and process (manage) personal information about CYP, their responsible adult(s), staff, and others, safely and lawfully. This includes:

i. securely manage electronically held information in line with Meeting digital and technology standards in schools and colleges and Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK (see also Online Safety), Data (Use and Access) Act 2025.

ii. manage requests for access to personal information we hold (known as subject access requests).

8.2 Details of our processes and how to request access to personal information we hold are outlined in MAT Data Protection Policy (GDPR).

8.3 **Storage and management of safeguarding information (child protection files)**

8.3.1 Any member of staff receiving a disclosure of abuse from a CYP or noticing signs or symptoms of possible abuse and/or harm, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the CYP's own words (verbatim) as far as possible. All notes should be timed, dated and signed, with the name printed alongside the signature.

8.3.2 The notes then need to be added to CPOMS* (or for *onboarding schools, their safeguarding system, i.e., My Concern – hereon after, CPOMS denotes any school's safeguarding system as specified here) and the D/DSL(s) alerted. Where the use of CPOMS is not possible, the documented disclosure will be passed immediately to the DSL, who will place them into an allocated child-file stored within the locked safeguarding cabinet or will use allocated yellow plastic files to indicate Child Protection files that are written. A chronology of safeguarding events and referrals will also be logged (this is automatic in CPOMS* - this is a safe and secure system.)

8.3.3 For non-safeguarding matters, notes may be recorded on Arbor or CPOMS, dependent upon each Trust setting and, if further evidence such as statements are taken (see MAT Behaviour […] Policy and Procedures: Appendix H), they should be placed on the CYP's main file.

8.3.4 When a concern about a CYP's welfare or safety is raised it will be discussed with the DSL and recorded (as above). The DSL will decide if the concern should be shared with another agency or kept on record in case future concerns arise.

8.3.5 Records should include:

i. a clear and comprehensive summary of the concern;

ii. details of how the concern was followed up and resolved (added action on CPOMS);

iii. a note of any action taken, decisions reached and the outcome (added action on CPOMS).

iv. All concerns relating to serious violence must be recorded on CPOMS. Records should clearly identify:

- nature of concern;
- weapon involvement;
- risks identified;
- actions taken;
- agencies involved;
- safety plans implemented;
- outcomes and review dates.

v. DSLs should monitor patterns and trends to identify emerging risks and target interventions appropriately.

8.3.6 All records will be stored on the secure system of CPOMS but where there are additional files, these will be stored in a separate confidential file in a locked cabinet, in a secure place with restricted access.

8.3.7 Worries about sharing information must never delay action to protect a CYP.

8.3.8 No single staff member or agency holds the complete picture of a CYP's life. Information will therefore be shared promptly and proportionately in accordance with safeguarding legislation and guidance.

8.4 Sharing safeguarding information with others

8.4.1 We are proactive in sharing information with each other and others who are working with our CYP and their responsible adult(s) as early as possible, so that CYP can receive the help and support they need.

8.4.2 Staff are expected to share information with one another as part of their work in school about the needs and risks of CYP on a need-to know basis. Staff are not permitted to share information with friends, family, or anyone in the local community outside of their work.

8.4.3 Access to safeguarding records will be restricted to authorised staff. Schools will regularly review access permissions and ensure safeguarding records are protected from inappropriate access, amendment or disclosure.

8.5 Transfer of child protection files and other safeguarding information

8.5.1 Where CYP leave the school or college (including in-year transfers) the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. When a CYP transfers to another school/setting within this or another authority, the confidential information held is forwarded under confidential cover and separate from the CYP's main file to the DSL for child protection in the receiving school/setting. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained (Appendix C).

8.5.2 If a CYP is absent from education or Electively Home Educated, we share relevant information with the Local Authority as required by law (please also see Supporting CYP Potentially at Greater Risk of Harm). If the CYP leaves our setting and does not move to a new education setting, we transfer their child protection file (and any additional information as necessary) to the relevant Local Authority that they reside in line with the local protocol.

8.5.3 In addition to the child protection file the DSL will consider sharing information with the new setting/school/college in advance of a CYP leaving. We use Shropshire Transition in Education Guidance to guide our practice approach.

8.5.4 When a CYP joins the school, the DSL, DDSL, will review any child protection files and safeguarding information received from previous settings as soon as reasonably practicable. Any identified risks, vulnerabilities, ongoing Family Help involvement, statutory social care involvement or other safeguarding concerns will be considered and appropriate action taken without delay. The school will ensure that child protection files are transferred securely and in accordance with statutory guidance and local safeguarding procedures. The DSL, DDSL will determine whether immediate action is required and ensure that relevant staff are made aware of information necessary to safeguard and promote the welfare of the child

8.5.5 Where safeguarding records are not received within statutory timescales, the receiving DSL will actively pursue the file and escalate concerns where necessary.

8.5.6 Where information received indicates an identified risk to the CYP, other CYP or staff, the receiving DSL/DDSL will undertake an assessment of risk and ensure that appropriate safety, support and risk management arrangements are implemented without delay. The transferring and receiving DSLs should discuss significant safeguarding concerns to support effective transition planning.

8.6 Sharing information with other organisations

8.6.1 Staff should be familiar with and use Information sharing advice for safeguarding practitioners.

8.6.2 Information may be shared without consent where:

- **i.** Seeking consent may increase the risk of harm to a child.
- **ii.** Consent cannot reasonably be obtained.
- **iii.** There is a legal duty or safeguarding justification to share.

8.6.3 Information sharing decisions will be necessary, proportionate, relevant, accurate, timely and secure.

8.6.4 As part of our work in partnership with families and CYP, consent to share their information with others outside of school should always be sought from a CYP and their responsible adult(s) unless it is not safe to do so. This includes where seeking consent would delay in making enquiries about significant harm.

8.6.5 If a person with parental consent or CYP does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a CYP safe and promoting their welfare. Therefore, staff must make a CYP's responsible adult(s) and CYP aware that information may still be shared with other organisations if necessary to help keep CYP safe or promote their welfare or if there is another legal basis to so do.

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

8.6.7 The Data Protection Act 2018 and UK General Data Protection Regulation do not prevent the sharing of information for the purposes of keeping CYP safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the D/DSL. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of CYP. Timely sharing is essential to effective safeguarding.

8.6.8 Child protection records will be organised and clearly identify significant events, cumulative harm, current safeguarding risks, protective factors and ongoing support needs. DSLs will ensure structured summaries are maintained where records are extensive or where safeguarding concerns span multiple years.

8.7 The Wave: reviewing information over time

8.7.1 When information is being accumulated prior to possible referral we will start a chronology of events via our online safeguarding system, CPOMS.

8.7.2 The DSL will regularly review all child protection chronologies to decide if the accumulation of events is having a detrimental impact on a CYP and must be referred on. If the DSL decides not to refer, the reason will be noted on the CYP's chronology. This review should take place as part of the Wave Review (see MAT Behaviour […] Policy and Procedures).

8.7.3 The Trust adopts a graduated review system to ensure the needs of all CYP are identified, understood and responded to in a timely manner. This system considers the holistic needs of all CYP including (but not limited to) their contextual safeguarding needs, academic attainment and progress, attendance, and vulnerability factors (pupil premium, Children previously or currently looked after, supported by a social worker, young carer etc.) CYP are placed within our tiered 'Wave' system against the Learning for Life framework (see Appendix B). Reviews of the Wave are regularly completed within each school (at least every three weeks) and the MAT DSL alongside MATi colleagues also completes regular compliance checks and vulnerable CYP reviews to ensure that all CYP with safeguarding concerns are supported effectively.

9 Managing Disclosures from CYP

9.1 Staff and volunteers in schools are in a unique position to observe CYP's behaviour over time, and often develop close and trusting relationships with them. If a CYP discloses directly to a member of staff, they must act immediately and speak to the Designated Safeguarding Lead or Deputy; the following procedures will be followed. There are keywords that, when used, should be triggers for action, regardless of intent. In the case of violent, sexual, racist or prejudiced language, the least that should happen is a record of the incident, a discussion with the CYP, and CYP's responsible adult(s) informed, i.e., rape, rapist, sexual assault or forced sexual activity.

9.2 ***Listen carefully to what is said:*** Ask no leading questions (i.e., questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, for example, "Did your parent hit you?") The questions will relate to clarification of what has been expressed by the CYP.

9.3 ***Do not force the CYP to repeat what was said in front of another person:*** Following a disclosure, the member of staff should talk immediately to the DSL and complete a written record. Responsible adult(s) will normally be informed unless doing so may place the child at risk of harm, compromise a safeguarding enquiry, or where advice from Children's Social Care, Police or other safeguarding agencies indicates otherwise.

9.4 ***Recording:*** Ensure that the disclosure is recorded using the words said by the person making the disclosure.

9.5 All disclosures must be managed as per 8.1 Storage and management of safeguarding information (child protection files).

9.6 **Supporting staff and supervision**

9.6.1 We recognise that staff working in Trust schools, who have supported a CYP who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. All Trust schools will support such staff by providing an opportunity to talk through their anxieties with the DSL, and to seek further support as appropriate.

9.6.2 To ensure that all staff are alert to any issues for concern, staff receive regular training and updates in safeguarding and child protection through a range of training and supervision activities. This includes both formal and informal supervision, annual appraisals, staff meetings and access to National College, Family Help and SSCP approved training. Individual supervision offers specialist staff an opportunity to receive coaching to improve their practice with CYP and address any issues resulting in poor performance. Individual supervision also provides a safe space in which to raise any concerns they may have about the conduct of other adults connected with the setting. All Trust schools ensure that D/DSL(s) and Designated Teachers (DTs) for Children Previously or currently

Looked After (P/CLA) receive supervision either facilitated within the setting or with an external provider.

9.6.3 Staff supervision is also used to ensure that all staff remain suitable to work with CYP. If a member of staff is taking medication which may affect their ability to care for CYP, the staff member should seek medical advice. The setting will ensure that staff members only work directly with CYP if medical advice confirms that the medication is unlikely to impair that staff member's ability to look after CYP properly.

9.6.4 Staff are also required to disclose any information, which may lead to their disqualification as outlined in Early years foundation stage (EYFS) statutory framework - GOV.UKand Keeping children safe in education 2026: September 2026

10 Working in Partnership

10.1 As is outlined in our safeguarding statement, and in order to ensure all CYP in our Trust are effectively safeguarded and their welfare is promoted, all Trust schools will work in partnership with our CYP, their families and other agencies/partnerships as follows:

10.2 CYP

10.2.1 Our CYP are taught how to keep safe, including how and when to share or report to us any worries or concerns they may have about their safety and wellbeing, or that of others. We encourage CYP to share and report worries and concerns. These are outlined in each schools' school-specific protocols (available on each schools' website).

10.2.2 Staff are expected to build trusted relationships with, and work in the best interests of CYP in line with our safeguarding statement and recognise, respond and report staff safeguarding concerns.

10.2.3 We also actively seek children's views of safety in school through school-specific voice captures (surveys, spotlights, discussions), via our Trust MyVoice (individual CYP survey online) and OurVoice (school-specific CYP group discussions).

10.3 Responsible adult(s)

10.3.1 We recognise the importance of working together with and supporting families to safeguard and promote the welfare of their children. Staff, however, must not use personal devices or private email accounts for work-related communication with CYP or families.

10.3.2 To permit strong partnership between schools and CYP's responsible adult(s), schools will:

i. meet with responsible adult(s) prior to CYP starting a Trust school to request information relating to the CYP's routines, likes and dislikes, special dietary requirements, intolerances/ allergies and allergy action plans and requesting responsible adult(s) inform us of any changes to these throughout the year.

ii. communicate to responsible adult(s) how we keep CYP safe in our school (including online) and how they can keep their child(ren) safe at home, including filtering, monitoring and safer use of AI. This policy is made available to all families via individual schools' websites. If a responsible adult(s) wants to raise concerns or complaints about how we keep their child safe, they can do this using the Complaints Policy which is available on all Trust schools' websites. We also actively seek views of responsible adult(s) regarding safety in school via family surveys and in discussion at open events, including family evenings.

iii. encourage responsible adult(s) to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. Staff are expected to respond to anybody who raises worries or concerns to them either about their child(ren) or others in line with Staff Safeguarding Concerns: Recognise, Respond, Report.

iv. coordinated by the DSL, ensure that we work with responsible adult(s) to offer and enable support for CYP and their families, taking action to safeguard and promote their welfare (see Designated Safeguarding Lead Response) in line with the local arrangements in the area that they live.

v. ensure that responsible adult(s) are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority and/or Enforcement Agencies.

vi. provide responsible adult(s) with regular information, guidance and external support available to them via weekly newsletters, signposting (in school-specific protocols), Facebook and emails.

vii. will support family-led planning and family group decision-making processes facilitated by partner agencies.

viii. will support Family Network approaches and Family Group Decision Making processes, recognising the important role that wider family members and support networks can play in improving outcomes and reducing safeguarding risks.

10.4 Other agencies/partnerships

10.4.1 As we operate in Shropshire, we engage and co-operate with our local safeguarding arrangements. Our local safeguarding partnership is the Shropshire Safeguarding Community Partnership (SSCP). We engage and co-operate by:

i. ensuring we effectively safeguard and promote the welfare of CYP living in Shropshire in line with Working together to safeguard children 2026 and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the family-help-together-a-framework-for-action.pdf Where CYP do not live in Shropshire but attend our school, we will work in line with the relevant local arrangements in their home area.

ii. recognising that Family Help sits between universal support and statutory intervention and will actively participate in Family Help assessments, Team Around the Child meetings and multi-agency planning processes where appropriate. The Trust will work in accordance with the local Family Help Together – A Framework for Action and associated Shropshire partnership

procedures. Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership

iii. ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding CYP potentially at greater risk of harm.

iv. supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.

v. working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure we are providing high quality education and support to CYP in Shropshire.

vi. complying with local Operation Encompass arrangements and relevant legislative requirements. to ensure information received is used to provide timely safeguarding support through participating in the local Operation Encompass (Domestic Abuse) | Shropshire Learning Gateway an arrangement where police notify schools when a CYP who attends their school may have been seen, heard or experienced police-attended incidents of domestic abuse. This enables us to provide appropriate emotional or practical support to CYP who may have seen, heard or experienced domestic abuse. CYP seeing, hearing or experiencing the effects of domestic abuse are victims of domestic abuse.

vii. All new responsible adult(s) are sent a letter informing them of our participation in Operation Encompass *(the letter to send to CYP's responsible adult(s) can be found at* Operation Encompass (Domestic Abuse) | Shropshire Learning Gateway

10.4.2 Where staff believe a CYP remains at risk and decisions made by another agency are not effectively safeguarding the child, the DSL will utilise local escalation procedures and maintain professional challenge until concerns have been satisfactorily addressed. Reporting a safeguarding concern - Professionals

10.4.3 Where concerns relate to an unborn child, staff will contribute to multi-agency assessment, planning and safeguarding arrangements in accordance with local procedures. Where concerns are identified regarding an unborn child, the school will contribute to assessments, planning meetings and multi-agency arrangements in accordance with local Family Help and safeguarding procedures.

10.4.4 All schools will make use of professional challenge and escalation procedures where practitioners believe decisions do not adequately safeguard a CYP.

10.5 Community Safeguarding

We recognise the importance of working with our community of stakeholders. All schools produce a triennial Community Plan including safeguarding-specific actions. These are published on each schools' website.

10.6 Shropshire Blended Practice Model

10.6.1 The Trust adopts the principles of the Shropshire Blended Practice Model.

10.6.2 The model provides a consistent approach to safeguarding and family support and reflects the expectations set out in Working together to safeguard children 2026 and the Shropshire Family Help Together Framework.

10.6.3 Practitioners will build trusted relationships with CYP, families and professionals. Safeguarding practice should seek to understand the CYP's lived experience, build on strengths and maintain the child's voice at the centre of all decision-making.

10.6.4 Practitioners will work collaboratively with families wherever safe and appropriate to do so. This includes respectful challenge, honesty, shared problem-solving and supporting families to identify solutions and positive change.

10.6.5 Practitioners will recognise the impact of adversity, trauma, abuse, discrimination and stress on CYP and families. Practice should seek to create safety, reduce shame and understand what may sit behind behaviour rather than making assumptions.

10.6.6 Decision-making should be evidence informed, reflective and supported through supervision and multi-agency discussion where appropriate.

10.6.7 The Trust will ensure that safeguarding practice is anti-racist, anti-discriminatory and inclusive. Staff will recognise and challenge discrimination, racism, prejudice, adultification and bias and will take account of how poverty, disability, culture, identity and lived experience may impact upon safeguarding outcomes.

11 Teaching Our CYP How to Keep Safe

11.1 We recognise that educating our CYP in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. We have a clear set of values and standards to provide opportunities for CYP to learn how to keep themselves and others safe that are demonstrated and reinforced throughout school life and underpinned through:

i. Safeguarding Statement

ii. MAT Behaviour […] Policy and Procedures

iii. Preventing Radicalisation

iv. our curriculum underpinning online safety including AI.

v. Through our PPSHE and (R(S)HE), Computing curriculum and associated policies, we provide a broad and balanced safeguarding curriculum. Our R(S)HE programme is fully inclusive and tailored to the age, stage of development and needs of CYP, including those who may be at greater risk of harm. The curriculum teaches safeguarding, including online safety, and addresses the safeguarding themes and risks identified within Keeping Children Safe in Education 2026, Part Two: Opportunities to Teach Safeguarding.

vi. interpreting the world in which we live including recognising and responding to misinformation.

11.2 The DSL, R(S)HE lead and other key members of the Senior Leadership Team (such as Online Safety Lead, Designated Mental Health Lead and SENDCo) will work collaboratively to ensure that this is implemented, and being responsive to any safeguarding themes or patterns of concern that arise in school.

12 Online Safety

12.1 Risks

12.1.1 The use of information and communication technology (ICT) is a vital part of the everyday functioning and life in school. We also recognise the important role ICT plays in the lives of our CYP and their families.

12.1.2 Whilst there are many benefits and strengths in using ICT, there are also a number of risks to CYP's welfare and safety in school when using internet enabled technology, which are summarised in the following categories:

i. **content:** being exposed to illegal, inappropriate, or harmful content, which may include but is not limited to: pornography, fake news, misogyny, self-harm, suicide, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

ii. **contact:** being subjected to harmful online interaction with other users which may include but is not limited to: peer to peer pressure, and adults posing as children or young adults to groom or exploit children.

iii. **conduct:** online behaviour that increases the likelihood of, or causes, harm to children or others which may include but is not limited to: making, sending, and receiving explicit images, sharing other explicit images and online bullying.

iv. **commerce:** - illegal, inappropriate, or harmful online commercial activities that can compromise the health and wellbeing or security of children or others which may include but is not limited to: online gambling, inappropriate advertising, phishing, or financial scams.

12.1.3 Trust schools adopt whole school approaches to online safety which aims to safeguard and educate CYP and their families, staff, and visitors to schools in the use and management of ICT (including the use of camera-enabled mobile and personal devices, and the ICT systems in place) including the teaching of risks associated with gambling, scams, phishing, misinformation, deepfakes, extremist content, pornography, AI generated content. The Trust's ICT Policy outlines the Trust approach.

12.1.4 The Trust promotes the responsible and ethical use of Artificial Intelligence (AI) to support teaching, learning and operations. AI must never replace professional or safeguarding judgement. Only Trust-approved AI tools may be used, and no identifiable information about CYP, staff or families may be entered into any AI system. All use of AI will follow the MAT Artificial Intelligence Policy, Data Protection (GDPR) and ICT Acceptable Use Policy. Any AI-related concerns or breaches must be reported immediately to the DSL and ICT Support. CYP will be

taught, in age-appropriate ways, how to use AI safely, ethically and under supervision.

12.1.5 Where there are online safety concerns involving identified CYP (including child-on-child abuse), our schools will follow Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Safeguarding Response.

12.1.6 Any school cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported in line with our Data Protection Processes to the Https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/. Please also see Record Keeping and Information Security. For more information, those reporting any such breaches must contact the schools' Operations Manager for more information.

12.1.7 Where CYP are being asked to learn online at home, our schools follow advice from the Department of Education; Safeguarding and remote education .

All Trust schools review their online safety arrangements annually to ensure that they meet the Keeping children safe in education 2026: September 2026and Safeguarding Children and protecting professionals in early years settings: online safety considerations online safety standards (including the digital standards for filtering and monitoring and cyber security). Any risks arising from reviews are clearly recorded as part of school evaluations and improvement action planning processes.

12.1.8 All staff, senior leaders and governors are appropriately trained (see Professional Development and Supervision) to enable them to ensure effective online safety arrangements and the ethical and safe use of AI. All schools will respond to online safety incidents which indicate safeguarding concerns in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response sections of this policy.

12.1.9 Trust staff recognise that Artificial Intelligence and Deep Fakes content pose an emerging risk to CYP including AI-generated sexual imagery, Deepfake imagery, AI-enabled grooming, AI-assisted bullying and harassment, Synthetic child sexual abuse material. All incidences will be managed as safeguarding concerns and referred to external agencies where appropriate.

12.1.10 Staff should recognise that AI may be used to generate, manipulate or distribute abusive, harmful or sexually explicit content involving children. Any report involving AI-generated intimate images, deepfakes or digitally altered sexual content must be managed as a safeguarding concern and may constitute a criminal offence:

https://saferinternet.org.uk,https://www.iwf.org.uk, https://www.ceop.police.uk,https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/

12.1.11 Schools will maintain clear expectations regarding the safe use of mobile devices, social media and wearable technology in line with DfE guidance and local risk assessments.

12.1.12 Filtering and monitoring systems will be reviewed annually and following any significant safeguarding incident, cyber security incident or emerging online risk.

12.2 Incidents involving nude or semi-nude images

12.2.1 Incidents involving nude or semi-nude images, including AI-generated or digitally altered sexual or abusive imagery and deepfake content will be managed as follows:

i. The incident will be referred to the D/DSL immediately and the D/DSL will discuss it with the appropriate staff. If necessary, the D/DSL may also interview the CYP involved.

ii. Responsible adult(s) will be informed at an early stage and involved in the process unless there is good reason to believe that involving them would put a CYP at risk of harm.

iii. At any point in the process, when there is a concern a CYP has been harmed or is at risk of harm we will refer the matter to the Police and/or Children's Social Care.

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

12.2.3 Senior members of staff, in conjunction with the DSL, may need to view data stored on devices if there is due cause to suspect that these conditions have been broken. CYP found to be responsible for an offence will have their device confiscated; it will be returned to their family or passed to the police. If there is suspicion that a device contains inappropriate images or digital content it will not be interrogated but it will be confiscated, and the device will be passed on to the police for investigation.

12.3 Self-generated intimate images and/or videos (including AI-generated or manipulated images)

12.3.1 When managing incidents involving Self-generated intimate images and/or videos (including AI-generated or manipulated images), including AI-generated or digitally altered sexual or abusive imagery and deepfake content, the following guidance will be followed:

12.3.2 **Staff will not:**

i. view any images suspected of being Self-generated intimate images and/or videos (including AI-generated or manipulated images), unless there is no other possible option, or there is a clear need or reason to do so. If it is deemed necessary, the image will only be viewed by the D/DSL and their justification for viewing the image will be clearly documented on CPOMS.

ii. send, share, save or make copies of content suspected to be an indecent image of a CYP (i.e., Self-generated intimate images and/or videos (including AI-generated or manipulated images)) and will not allow or request CYP to do so if made aware of an incident involving the creation or distribution of Self-generated intimate images and/or videos (including AI-generated or manipulated images).

12.3.3 **Staff will:**

i. immediately notify the D/DSL of any suspected Self-generated intimate images and/or videos (including AI-generated or manipulated images).

ii. act in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response sections of this policy.

iii. respond in line with the UKCCIS: 'Sexting in schools and colleges: responding to incidents and safeguarding young people' guidance.

iv. store the device securely.

v. consider the deletion of images but delete images only when the D/DSL has confirmed that other agencies do not need to be involved and are sure that to do so would not place a CYP at risk or compromise an investigation.

12.3.4 **The D/DSL and Online Safety Lead will:**

i. act to block access to all users and isolate any indecent images taken or shared on our network or devices.

ii. carry out a risk assessment which considers any vulnerability of CYP involved, including carrying out relevant checks with other agencies.

iii. inform responsible adult(s), if appropriate, about the incident and how it is being managed.

iv. make a referral to Children's Services and/or the Police, as deemed appropriate.

v. provide the necessary safeguards and support for CYP, such as offering counselling or pastoral support.

vi. implement appropriate sanctions in accordance with the MAT Behaviour […] Policy and Procedures.

vii. review the handling of any incidents to ensure that best practice was implemented; the Leadership Team will also review and update any management procedures, where necessary.

12.4 Mobile Phones

12.4.1 In line with Keeping Children Safe in Education 2026, all Trust schools will maintain mobile-phone free learning environments. Each school will have a clear mobile phone policy and associated procedures setting out expectations for CYP, staff and visitors, including how mobile phones and other personal internet-enabled devices may be used, stored, restricted, monitored and sanctioned where necessary. Schools will ensure arrangements support safeguarding, behaviour, learning and wellbeing.

13 Preventing Radicalisation

13.1 The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015, places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being drawn into terrorism.

13.2 Our Trust schools fulfil their duties by:

i. promoting fundamental British Values as part of our values and curriculum.

ii. ensuring that we provide a safe space for CYP to understand and discuss sensitive topics, those linked to radicalisation, terrorism and extremism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.

iii. being alert to and identifying CYP who may be susceptible to extremist ideology and radicalisation into terrorism, and where it is assessed as appropriate by the Designated Safeguarding Lead, make a Prevent referral (in line with the local Preventing Terrorism Processes).

iv. monitoring and reporting any hate-based behaviour as part of our MAT Behaviour and Tackling Bullying […] Policy and Procedures (Hate related incident reporting processes can be found hate-related-incident-reporting-form-shropshire-schools.docx).

v. outlining in our MAT ICT, and MAT Relationship Sex Health Education Policies how CYP are being safeguarded from being drawn into terrorism (including visiting speakers; we ensure that hosting external speakers or visitors that attend our school premises are suitable and appropriately supervised, see also, Visitors). (Please also refer to Teaching Our CYP How to Keep Safe.

vi. assessing the risk of our CYP being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in our school evaluation processes and inform our approach to online safety (including filtering and monitoring and cyber security arrangements).

13.3 All Trust schools regularly review their adherence to the Prevent Duty. Any actions arising from assessments are included in school evaluation and improvement action planning processes, captured in schools' individual prevent risk assessments. These are reported to and overseen by our Local Governing Bodies and available upon request.

13.4 All staff, senior leaders and governors are appropriately trained (see Professional Development and Support) to enable them to ensure that all CYP, particularly those who may be susceptible to extremist ideology and radicalisation are effectively safeguarded. We respond to CYP who are identified as being susceptible to an extremist ideology in line

with the Staff Safeguarding Concerns: Recognise, Respond, Report and Designated Safeguarding Lead Response sections of this policy.

14 Supporting CYP Potentially at Greater Risk of Harm

14.1 We recognise that whilst all CYP should be protected, some groups of CYP, are potentially at risk of greater harm than others, both online and offline, including risks arising from online activity, digital coercion, or AI-generated/altered content. The list below is not exhaustive but highlights some of those groups. Where a CYP falls into multiple groups this potentially further increases their vulnerability.

14.2 Staff will recognise that some forms of abuse may remain hidden for extended periods and CYP may not disclose concerns directly. Staff should recognise that most sexual abuse is committed by someone known to the CYP. Abuse may occur within families, peer groups, friendships, intimate relationships, community networks or online relationships. The fact that a CYP knows or trusts the individual responsible must never reduce professional curiosity or safeguarding concern.

14.3 We give special consideration to CYP who (this list is not exhaustive):

i. have special educational needs (SEN) or disabilities or health conditions (see MAT SEND Policy);

ii. are young carers;

iii. may experience discrimination due to one or multiple protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religious belief, sex or sexual orientation; see MAT Equality, Diversity and Belonging for CYP Policy);

iv. have English as an additional language;

v. are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence (including those with Operation Encompass alerts);

vi. are at risk of FGM, sexual exploitation, forced marriage, or radicalization;

vii. are asylum seekers;

viii. are at risk due to either their own or a family member's mental health needs;

ix. are looked after or previously looked after (see MAT Children who are Previously or currently Looked After (P/CLA) Policy);

x. are missing from education or persistently or severely absent from education (see MAT Attendance Policy) and/or

xi. whose family has expressed an intention to remove them from school to be home educated.

14.4 **CYP who need a social worker (Child in Need and Child Protection Plans)**

i. CYP may need a social worker due to safeguarding or welfare needs. CYP may need this help due to abuse and/or neglect and/or exploitation and/or harm and/or complex family circumstances. A CYP's experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

ii. In partnership with the Virtual School(s), the D/DSL will also work with the Virtual School to support CYP with a Social Worker, much like that of CYP P/CLA.

14.5 **CYP in Kinship Care**

14.5.1 CYP in kinship care may experience additional safeguarding, attendance, attainment and wellbeing challenges. Schools will work with responsible adult(s), Virtual Schools and partner agencies to identify and address needs at an early stage.

14.6 **CYP who are young carers** Unpaid carers action plan: recognise, refer, reach - GOV.UK

i. A young carer is someone aged 16 and under who cares for a friend or family member who, due to illness, disability, a mental health problem or an addiction, cannot cope without their support. Older young carers are also known as young adult carers (25 and under), and they may have different support needs to younger responsible carers.

ii. The level of responsibility assumed by a young carer is often inappropriate to their age and at a level beyond simply helping with jobs at home, which is a normal part of growing up; as such it may impact on the education of the CYP.

iii. Unless the school is advised about a CYP's home circumstances, a young carer can first be identified by negative aspects of their engagement in school (attendance, punctuality, behaviour, work, etc.) Some young carers worry about appearing different to their peers due to bullying or interference in their family life and may seek support to conceal their role from their peers and from teachers.

iv. Key indicators that a CYP is a young carer, may include:

- regular lateness, or unexplained absence, possibly increasing periodically
- tiredness during the school day
- lack of homework completed or poor quality
- lack of concentration, anxiety or worry

- under-achievement for potential capability
- behavioural problems
- lack of interest in extra-curricular activities, especially after school
- disinterest, delays in response, non-attendance to progress evenings/information evenings
- poor hygiene/physical appearance and/or
- being the victim of bullying.

14.7 CYP currently or Previously Looked After (P/CLA)

14.7.1 All schools within the Trust have a Designated Teacher (DT) for CYP Previously or currently Looked After (P/CLA). Under this role, for each CYP they:

i. know the CYP's looked after legal status (looked after under voluntary arrangements with consent of parents, or an interim, or full care order)

ii. hold contact arrangements for birth parent(s), or those with parental responsibility

iii. hold information about the CYP's care arrangements, and the levels of authority delegated to the responsible adult by the authority looking after them

iv. hold details of the CYP's social worker, and the name of the virtual school head in the authority that looks after the CYP

v. know that a previously looked after CYP may remain vulnerable, both online and offline, and may require ongoing additional support. All staff will monitor these CYP carefully and refer to the Designated Teacher for Looked After Children (see MAT Looked After and Previously Looked After Children Policy for details).

14.7.2 In partnership with the Virtual School(s), DTs for P/CLA will work to support the educational attendance, attainment, and progress of Children P/CLA.

14.8 CYP absent from or not in receipt of full-time education

14.8.1 All CYP aged 5-16 are legally entitled to a full-time education, suitable to any special education need. Education is essential for CYP's progress, wellbeing and

wider development and being in school is a protective factor against wider harms, including exploitation.

14.8.2 CYP being absent from education for prolonged periods and/or on repeat occasions and/or without explanation can act as a vital warning sign to a range of safeguarding issues including abuse, neglect, exploitation and/or harm, as well as other needs. Trust schools' response to persistently absent CYP and CYP who are absent from education supports identifying such abuse, and in the case of absent CYP, helps prevent the risk of them becoming a 'child missing education' in the future.

14.8.3 Where reasonably possible all Trust schools will hold at least two emergency contacts for every CYP in their setting in case of emergency and in case there are welfare concerns at home.

14.8.4 Trust staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. We refer to and use Statutory Guidance on Children missing education - GOV.UK to ensure we comply with our duties regarding CYP missing education. This includes notifying the Local Authority in line with the Shropshire Council Children Missing Education process when removing a CYP from the school roll at standard and non-standard transition points.

14.8.5 There are many reasons why we want CYP to have regular attendance at Trust settings: as well as supporting their learning and development, we want to ensure that CYP are kept safe, their wellbeing is promoted, and they do not miss out on their entitlements and opportunities. In a small minority of cases, good attendance practice may also lead to the earlier identification of more serious concerns for a CYP or family and may have a vital part to play in keeping a CYP or other family members safe from harm.

14.8.6 In Trust settings, we have procedures for recording and following up any unexplained non-attendance and know how to respond to different problems and where to access advice, support or whom to alert when concerns arise. Please see MAT Attendance Policy and school-specific appendices for more information.

14.8.7 Schools will routinely monitor attendance patterns of vulnerable groups, including CYP with a social worker, CYP receiving Family Help, CYP in kinship care, CYP previously looked after, CYP with SEND and CYP accessing Alternative Provision, to identify safeguarding concerns at the earliest opportunity. Attendance information will be reviewed alongside safeguarding, wellbeing,

behaviour and vulnerability indicators to ensure that emerging risks are identified and responded to promptly.

14.8.8 We have policies in place; that are in line with associated statutory guidance and Shropshire Council Education Access Service Local Processes including:

i. Attendance Policy (in line with Working together to improve school attendance and Children Missing Education process, when removing a CYP from the school roll at standard and non-standard transition points).

ii. Children with Medical and Health Needs Policy, including how we support CYP who cannot attend school (in line with Education for Children with health needs who cannot attend school).

14.8.9 Schools will analyse attendance patterns of vulnerable groups, including CYP with social workers, CYP in kinship care, CYP previously looked after, CYP with SEND and CYP receiving Family Help.

14.9 CYP who are Electively Home Educated (EHE)

14.9.1 Many home educated CYP have an overwhelmingly positive learning experience. We would expect the family's decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some CYP are less visible to the services that are there to keep them safe and supported in line with their needs. When a responsible adult(s) notifies us that they wish to deregister their child to electively home educated them, we will immediately notify the local authority.

14.9.2 Where those with parental responsibility express an intention to electively home educate, we coordinate meetings with responsible adult(s) and professionals to ascertain the appropriateness of such a decision, and adhere to DfE Elective Home Education Guidance and Shropshire Council Elective Home Education processes and protocols.

14.10 CYP who have experienced multiple suspensions and are at risk or, or have been permanently excluded

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

14.10.2 See MAT Behaviour […] Policy and Procedures for more information regarding expectations, and 14.12 for more information as to how CYP's needs are reviewed and supported.

14.11 CYP with Special Educational Needs and Disabilities (SEND)

14.11.1 CYP with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

14.11.2 We recognise that additional barriers can exist when recognising abuse, neglect or exploitation, and/or harm in this group of CYP (i.e., assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the CYP's impairment without further exploration.

14.11.3 For more information regarding Trust settings' specific support and arrangements for CYP with SEND, as per the SEND Code of Practice, The SEND local offer | Shropshire Council and Education for Children with health needs who cannot attend school, please refer to the MAT SEND Policy and individual settings' SEND Information Report.

14.12 CYP who are lesbian, gay, bi, trans or gender and identity questioning (LGBTQ+)

14.12.1 The fact that CYP may be LGBTQ+ is not in itself an inherent risk factor for harm, online and offline, however, CYP who are LGBTQ+ can be targeted by other CYP. In some cases, CYP who are perceived as LGBTQ+ (whether they are or not) can be as vulnerable as CYP who identify as LGBTQ+.

14.12.2 All staff will ensure inclusivity of LGBTQ+ CYP as part of the statutory Relationships Education, Relationships and Sex Education and Health Education guidance curriculum and will receive training to provide a safe space for LGBTQ+ CYP to share their concerns. A trusted adult will be identified to support CYP wanting, or in need of, support.

14.12.3 The Trust recognises that some CYP may question their gender identity at different stages of their development. Staff will approach all such circumstances with sensitivity, dignity, respect and a child-centred focus, ensuring that the welfare, safeguarding and best interests of the child remain paramount at all times.

14.12.4 The fact that a child is questioning their gender does not in itself constitute a safeguarding concern. However, staff should be aware that some CYP who are questioning their gender may experience additional vulnerabilities, including bullying, harassment, social isolation, emotional distress, mental health

difficulties, online harms, exploitation or abuse. Any safeguarding concerns will be considered individually based upon the child's circumstances, presentation, needs and risks.

14.12.5 Where concerns are identified, the school will adopt a child-centred approach, taking account of the CYP's wishes and feelings, age, understanding, developmental stage and individual needs. Decisions will not be based on assumptions, and each case will be considered on its own merits.

14.12.6 The school will actively involve responsible adult(s), those with parental responsibility wherever it is appropriate, lawful and safe to do so. Where professionals believe that involving responsible adult(s) may place a child at risk of significant harm, advice will be sought from the Designated Safeguarding Lead and, where necessary, other safeguarding agencies before information is shared.

14.12.7 The Designated Safeguarding Lead will ensure that decisions, discussions, assessments, rationale and agreed actions are clearly recorded and reviewed as required. Appropriate support will be coordinated through school-based provision, Family Help arrangements, health professionals and other agencies where necessary.

14.12.8 Schools will ensure that all CYP are treated with dignity and respect and that any safeguarding response remains focused on promoting welfare, reducing risk and achieving the best possible outcomes for the child.

14.12.9 Any CYP questioning their gender should be supported in a manner that is safeguarding-led, child-centred and evidence-informed. The school will follow any current DfE guidance relating to CYP questioning their gender and will take decisions on a case-by-case basis, informed by safeguarding risk assessment, responsible adult responsibility, legal duties and the best interests of the CYP.

14.12.10 All discussions, decisions, rationale and reviews to be recorded.

14.12.11 Schools will follow current statutory guidance and any published DfE guidance relating to CYP questioning their gender.

14.13 CYP requiring mental health support

14.13.1 Mental health problems can, in some cases, be an indicator that a CYP has suffered or is at risk of suffering abuse, neglect, exploitation, and/or harm. CYP who have mental health needs will often need Family Help or support to avoid their safety and welfare being compromised.

14.13.2 All Trust schools have a Designated Mental Health Lead who is a member of, or supported by, the Senior Leadership Team. All schools have routes to escalate

and refer, and accountability systems as per Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK (www.gov.uk)

14.13.3 KCSIE 2026 recognise warning signs that CYP may present. These include: KCSIE 2026 warning signs list:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

14.13.4 Any mental health interventions, support programmes or resources provided by schools will be selected on the basis that they are evidenced as safe, effective and appropriate to the age, developmental stage and educational phase of the CYP receiving them.

14.13.5 Schools will work collaboratively with Mental Health Support Teams (MHSTs) where available and utilise advice, consultation, training and intervention pathways to support CYP experiencing emerging or identified mental health needs.

14.14 **Supporting CYP with medical conditions at school**

14.14.1 The Trust recognises that CYP with medical conditions may be at increased risk of abuse, neglect, bullying, exploitation or poor educational outcomes. Staff should be aware that a medical condition may:

i. create barriers to recognising signs and indicators of abuse or neglect;

ii. affect a CYP's ability to communicate concerns, wishes or feelings;

iii. increase dependence on adults, creating additional safeguarding vulnerabilities;

iv. impact attendance, behaviour, emotional wellbeing and mental health;

v. result in increased periods of absence, reduced timetables or repeated hospital appointments which may mask safeguarding concerns.

14.14.2 All staff must maintain a professionally curious and child-centred approach and consider whether welfare or safeguarding concerns may be contributing to deteriorating health, attendance or presentation.

14.14.3 The DSL/DDSL will work closely with responsible adult(s), healthcare professionals, social care and other relevant agencies where concerns arise, ensuring appropriate information sharing, assessment and early help intervention. Individual Healthcare Plans (IHCPs), risk assessments and safeguarding records should be considered together, where appropriate, to ensure a coordinated response to a CYP's needs. Staff must immediately report any safeguarding concerns relating to a CYP with a medical condition to the DSL in accordance with Trust safeguarding procedures. Supporting pupils with medical conditions at school - GOV.UK MAT Children with Medical Needs Policy Autumn 2025 FINAL.pdf

14.14.4 Where a CYP has both safeguarding concerns and a medical condition, consideration should be given to how these needs may interact and whether additional support, monitoring, reasonable adjustments or multi-agency intervention are required.

14.15 **Reviewing the needs of CYP potentially at greater risk, and taking action**

14.15.1 For all CYP, particularly for those who potentially at greater risk of harm, all Trust schools run a Wave model whereby the needs of CYP are reviewed at least every three weeks. Supported by the Trust's Learning for Life Framework WAVE Guidance document, all schools convene multiple professionals' meetings from within the school, to discuss necessary adaptations (WAVE 1), interventions (WAVE 2), individualised (WAVE 3) and bespoke (WAVE 4) support required, including any possible external agency involvement or referrals, to bring about an improvement in circumstances and outcomes for the CYP. As part of the review of the WAVE, staff will liaise with the Headteacher, Senior Leadership Team, D/DSL, SENDCo, DT for P/CLA, Attendance Lead, and Raising Standards Leads (or equivalent) to explore if the behaviour demonstrated is possibly indicative of an unmet need, and whether external assessment or support is required.

14.15.2 During Wave reviews, Appendix B: Learning for Life Framework will be utilised to review CYPs positions on the Wave, and necessary next steps.

14.16 **Serious Violence**

14.16.1 Staff should be alert to indicators that a CYP may be involved in, impacted by, or vulnerable to serious violence, weapon carrying, gang-associated activity,

county lines activity, criminal exploitation or peer-group violence. Concerns may arise through changes in behaviour, attendance, presentation, peer associations, disclosures, online activity, intelligence shared by external agencies, or information reported by other CYP.

14.16.2 Concerns relating to the carrying, possession or use of a weapon, threats to use a weapon, threats of serious harm, or any expressed intention to cause significant injury to another person must be reported immediately to the DSL/ DDSL. Where there is an immediate risk to life or safety, emergency services will be contacted without delay.

14.16.3 The Trust recognises that serious violence can arise from escalating peer conflict, harmful group dynamics, exploitation by others, coercion, intimidation, criminal activity or wider safeguarding vulnerabilities. Staff should maintain professional curiosity and consider whether concerns may indicate unmet needs, contextual safeguarding risks, criminal exploitation, child-on-child abuse, trauma or adverse childhood experiences.

14.16.4 Upon receiving a report, the DSL/ DDSL will assess the level of risk, consider the views and circumstances of the child, gather relevant information and determine appropriate safeguarding actions. This may include engagement with responsible adult(s), Family Help, targeted intervention, multi-agency planning, referral to Children's Social Care, early intervention services, violence reduction programmes, youth support services or the Police, as appropriate.

14.16.5 The Trust recognises the importance of early identification and intervention. CYP identified as being at risk of involvement in serious violence will be offered appropriate support, which may include access to trusted adults, mentoring, pastoral intervention, emotional wellbeing support, therapeutic support, behaviour support, conflict resolution work and other targeted interventions designed to reduce risk and promote positive outcomes.

14.16.6 All concerns, assessments, decisions, actions and outcomes relating to serious violence will be recorded in accordance with this policy and reviewed regularly by the DSL to ensure that risk is appropriately managed and that CYP receive the support and protection they require. Where appropriate, the DSL/DDSL will consider actions to de-escalate peer conflict and reduce the risk of serious violence.

14.16.7 Staff must immediately report any concerns that a child is carrying a weapon, has used a weapon, has threatened to use a weapon, or has expressed an intention to carry or use a weapon.

14.16.8 The DSL/DDSL will consider appropriate actions to de-escalate peer conflict and reduce the risk of serious violence. This may include restorative approaches, mediation, safety planning, family engagement, mentoring, multi-agency support and targeted interventions.

14.17 Contextual Safeguarding

14.17.1 The Trust recognises that safeguarding incidents and vulnerabilities can occur outside the home and may be associated with relationships, peer groups, schools, local communities and online environments. These risks can have a significant impact on a CYP's safety, welfare and wellbeing.

14.17.2 Staff will consider contextual factors when assessing safeguarding concerns and will work with other agencies where appropriate to understand and reduce risk.

14.17.3 Contextual safeguarding concerns may include, but are not limited to:

i. Child exploitation, including sexual exploitation and criminal exploitation;

ii. County lines activity and associated criminality;

iii. Serious violence, including gang-associated activity, weapon carrying and peer-group violence;

iv. Harmful sexual behaviour, sexual violence and sexual harassment;

v. Online abuse, including cyberbullying, online grooming, coercion, exploitation, image-based abuse, AI-generated abuse and exposure to harmful content.

14.17.4 The DSL/ DDSL will consider contextual safeguarding risks when assessing concerns, completing risk assessments, planning interventions and determining appropriate safeguarding responses.

14.17.5 Staff should recognise that CYP who are criminally or sexually exploited may commit offences or display behaviour whilst under coercion, control or manipulation. Such CYP should be viewed as potential victims of exploitation first and foremost and safeguarding responses should reflect this.

14.18 Coercive Control

14.18.1 Staff should recognise coercive and controlling behaviour within family relationships and adolescent relationships as potential safeguarding concerns.

14.18.2 Safeguarding decisions will be based upon the CYP's lived experience, developmental needs, vulnerability and individual circumstances and not

assumptions relating to age, appearance, behaviour, culture, race, disability, gender or background.

14.18.3 Where concerns are identified, staff will actively challenge assumptions and ensure the CYP's voice, wishes and feelings remain central to assessment and decision-making.

14.19 **Adultification Bias**

14.19.1 Schools recognise that some CYP may experience adultification bias. Adultification occurs when a CYP is perceived as being older, more mature, more resilient, less vulnerable or more responsible for their actions than is appropriate for their age and developmental stage.

14.19.2 Staff will be aware that adultification may result in safeguarding concerns being overlooked, minimised or responded to less effectively.

14.20 **CYP in Temporary Accommodation**

14.20.1 Schools will have regard to statutory duties relating to temporary accommodation notifications and will respond promptly to information received from local authorities regarding children placed in temporary accommodation. Such information will be considered as part of safeguarding, attendance, welfare and inclusion planning to ensure support is provided at the earliest opportunity.

14.21 **Safeguarding babies, very young children and unborn children**

14.21.1 Staff will recognise that babies, unborn children and children under five are particularly vulnerable to abuse and neglect. Concerns relating to unborn children, pre-birth safeguarding, unexplained injuries and bruising in non-mobile children will be managed in accordance with West Midlands Safeguarding Procedures and local safeguarding partnership arrangements.

15 Child-on-Child Abuse

15.1 As set out in our **safeguarding statement**, we will not tolerate the abuse **and/or harm** of children. This includes where CYP abuse other CYP (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse. Staff should remain particularly alert to safeguarding concerns arising immediately before school, immediately after school, during transitions between lessons, during social times, on school transport and in online spaces where adult supervision may be reduced.

15.2 Reports of sexual violence and sexual harassment will never be dismissed as banter, teasing, growing up, part of friendship groups or accepted as normal behaviour. All schools recognise that child-on-child abuse is not an inevitable part of growing up and is preventable through early identification, education, intervention and a whole-school safeguarding culture.

15.3 We want to ensure that no child-on-child abuse takes place in our schools. However, we understand that we cannot just rely on CYP telling us that they are experiencing abuse from other CYP. Staff should understand that even if there are no reports in school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their professional development and support and supervision, which does not just rely upon CYP telling someone. Staff are expected to follow our Appendix G: Child-on-Child Abuse Procedures.

15.4 All schools monitor patterns of child-on-child incidents including those involving abuse and/or harm, to ensure that all are aware of and able to minimise and respond to any emerging themes or patterns of abusive behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by Local Governing Bodies and in turn Trustees.

15.5 This section should be read in conjunction with MAT Behaviour […] Policy and Procedures: Section 4 – Tackling Bullying.

15.6 All incidents of discriminatory treatment, bullying and harassment will be investigated thoroughly in accordance with the MAT Behaviour […] Policy and Procedures and recorded on CPOMS. Responses to substantiated incidents will be treated as a safeguarding concern and consider the needs of both the victim and perpetrator, and necessary actions to mitigate against recidivist behaviours, including education and intervention. As evidence indicates, perpetrators are likely to have themselves previously been victims of abuse, neglect, exploitation, and/or harm and therefore must be reviewed as a victim in their own right with appropriate subsequent support.

15.7 Appendices F, G and H should be used to support schools in their management of any allegation of child-on-child abuse, their response and then any necessary risk assessment.

15.8 Staff should recognise that child sexual abuse may remain hidden for significant periods and CYP may not disclose concerns directly.

15.9 CYP can report safeguarding concerns through a variety of ways including: Any trusted adult, worry boxes, student support teams and any other systems that individual schools have to support CYP in making disclosures.

15.10 Schools will comply with the statutory mandatory reporting requirements for child sexual abuse once enacted and will ensure all staff are trained and aware of their responsibilities.

15.11 **Prevention of child-on-child abuse**

15.11.1 We aim to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

i. expecting all staff and Governors/Trustees in our Trust adhere to and promote the commitments we make in our safeguarding statement.

ii. ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that our D/DSL and other relevant staff have completed training in how to assess and respond to child-on-child abuse. For further detail, please refer to Professional Development and Support.

iii. being clear how we expect our CYP to behave towards one another. Our MAT Behaviour […] Policy and Procedures, and school-specific protocols, outline these expectations; how schools will support CYP to understand and fulfil them; and how schools will prevent and respond to behaviour which falls below expected standards (including all forms of bullying – see MAT Behaviour […] Policy and Procedures: Section 4 – Tackling Bullying). Where behaviour also indicates child-on-child abuse, staff will adhere to the processes outlined in this section.

iv. ensuring we are teaching our CYP how to keep safe.

v. making sure that CYP who experience or are at risk of experiencing abuse and/or harm from other CYP are identified, feel supported and safeguarded from further harm.

vi. making sure that CYP who have caused or are identified as being at risk of being abusive in their behaviour towards other CYP are identified, supported and safeguarded from engaging in further harmful behaviour.

vii. making sure that we are taking positive action to ensure that CYP potentially at greater risk of harm are not disproportionately impacted by child-on-child abuse in our school.

15.12 What is child-on-child abuse?

15.12.1 Child-on-child abuse:

i. is when a CYP or group of CYP inflicts harm or fails to act to prevent harm to another CYP.

ii. includes actions that cause harm; this can be a single serious incident or a pattern of incidents.

iii. includes harm caused to a CYP that may be physical, emotional and/or psychological, and can include witnessing the ill treatment of others.

iv. can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context, we know that child-on-child abuse can take place in spaces and at times of the school day where CYP are less likely to be supervised. We also know that where child-on-child abuse is taking place outside of school (including online); this abuse can also continue and have an impact on a CYP when they are at school.

v. can be defined in different ways (examples are outlined in Keeping children safe in education 2026: September 2026: Part 1 and Part 5).

vi. may mean a CYP experiences one or multiple types of child-on-child abuse at the same time.

15.12.1 **Child-on-child abuse can manifest in different ways, such as:**

i. bullying (including cyberbullying, prejudice-based and discriminatory bullying)

ii. abuse in intimate relationships between CYP (also known as teenage relationship abuse)

iii. physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

iv. sexual violence and sexual harassment including AI-generated or digitally altered sexual or abusive imagery and deepfake content.

v. consensual and non-consensual sharing of nude and semi-nude images and/or videos. Please also see also online safety advice and protocol for responding to such incidences

vi. 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

vii. upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks or to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and initiation/hazing type violence and rituals

viii. misogyny, sexist attitudes gender-based harassment and harmful attitudes towards women and girls are safeguarding concerns.

ix. stalking

x. image-based abuse, AI-generated intimate imagery, deepfake abuse

xi. may also include violence between CYP, including assaults, threats of violence, weapon-related incidents and group-based violence.

xii. Emotional abuse may include persistent verbal abuse, humiliation, intimidation, rejection, ridicule, degradation, threats or other behaviour causing emotional harm.

15.12.2 Schools will challenge and respond to behaviours, language and attitudes which normalise abuse, coercion, violence, intimidation or discrimination.

15.12.3 Schools will comply with any statutory duty relating to the mandatory reporting of child sexual abuse and will implement any associated government guidance immediately upon introduction.

15.13 CYP who are more vulnerable to child-on-child abuse

15.13.1 Please read this alongside CYP potentially at greater risk of harm.

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

15.13.3 CYP who harm others may have additional or complex needs. Harmful behaviour by CYP can also be a sign or indicator that a CYP has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse, neglect, exploitation, and/or harm or some other form of adverse experience[2] in their life. CYP who harm other CYP may have power or privilege

[2] See Understanding trauma and adversity | Resources | YoungMinds for further information.

over CYP they are causing harm to but can also be powerless or vulnerable in other part of their lives.

15.13.4 Child-on-child abuse is harmful to all CYP involved.

15.13.5 Evidence[3] indicates that CYP from certain groups are more vulnerable to child-on-child abuse. This includes CYP who:

i. have special education needs and/or disabilities, and/or health issues.

ii. have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes CYP who are previously or currently looked after or who have a social worker due to safeguarding concerns.

iii. are eligible for free school meals. Socio economic inequality can increase incidents of bullying.

iv. are from Black, Asian and/or other minoritized ethnic communities (including travelling communities and CYP for whom English is an additional Language). These CYP are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as CYP who are being harmed and more likely to be over identified as CYP who are a risk of causing harm. This is known as adultification bias[4].

v. identify as Lesbian, Gay, Bi-Sexual, Transgender or Gender or Identity Questioning (LGBTQ+). These CYP are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.

vi. are female: girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.

vii. are male: boys are more vulnerable to experiencing bullying that is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

[3] Evidence sources:

- Keeping children safe in education 2026 (comes into force from 1 September 2026)Part 2: CYP potentially at greater risk of harm.
- Prevalence of bullying (anti-bullyingalliance.org.uk).
- Safeguarding d/Deaf and disabled CYP| NSPCC Learning;
- Safeguarding CYP from Black, Asian and minoritised ethnic communities | NSPCC Learning;
- Safeguarding LGBTQ+ CYP | NSPCC Learning;
- Spotlight #3: Young people and domestic abuse | Safelives.
- Addressing child-on-child abuse: a resource for schools and colleges (farrer.co.uk)

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

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

15.14.1 We recognise the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse. In considering whether behaviour is abusive; staff should consider the impact on the CYP affected by the behaviour including:

i. Any behaviour that is likely to have an impact on a CYP's physical and emotional health, and development, should be considered potentially harmful. The greater the impact of the behaviour on the CYP's health and development, the greater level of harm caused to them.

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

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

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

15.14.2 **The behaviour of the CYP who is/are causing harm**

i. It is important to consider the behaviour of CYP on a continuum, taking account of their age and level of development as well as any other needs or circumstances that may influence their behaviour, i.e., a CYP who is causing harm to other CYP could be an indication that they have unmet needs, or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them.

15.15 Features of abusive behaviour can include:

i. a pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)

ii. a misuse of power over the CYP who is being harmed.

iii. victimisation of the CYP who is being harmed. This could also include circumstances where the CYP causing harm is supported or joined by other CYP.

iv. intrusive behaviour: not considering or enabling the CYP being harmed to freely agree and/or consent to the behaviour.

v. an element of control, coercion and/or force.

vi. threats or enactment of physical/sexual violence (this does not always have to be enacted, but where it is so would heighten the level of concern).

vii. evidence that a CYP is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

15.16 **Our response to child-on-child abuse**

15.16.1 In most instances, schools will use the MAT Behaviour and Tackling Bullying […] Policy and Procedures to manage the conduct of CYP towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns then staff will also need to raise such concerns to the DSL in line with the Staff Safeguarding Concerns: Recognise, Respond, Report section.

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

i. Part 5 Keeping children safe in education 2026: September 2026

ii. Use of reasonable force in schools

iii. Searching, screening and confiscation at school

iv. Sharing nudes and semi-nudes: advice for education settings working with CYP

v. When to call the police: guidance for schools and colleges.

15.17 **Risk and needs assessment**

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

ii. The Trust deems it necessary to complete a formally recorded risk and needs assessment for all CYP involved in child-on-child abuse incidents. The decision to complete a formal risk assessment will be taken by the DSL.

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

iv. The risk and needs assessment will be completed taking account of information from all key staff (and relevant involved professionals) working with the CYP, as well as their

responsible adult(s). It will also include the views and feelings of the CYP, where this is safe and appropriate to do so.

v. The risk assessment will be shared will all staff and relevant involved professionals who work with the CYP as well as responsible adult(s). It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

vi. In circumstances where CYP are displaying sexual behaviour towards other CYP that raises concern all schools' DSLs are trained in and will use the Brook Traffic Light Tool to inform the risk and needs assessment. CPD: Brook Sexual Behaviours Traffic Light Tool (RSE) Course

vii. Our template risk and needs assessment can be found in Appendix H.

15.18 Response

15.18.1 The responsible adult(s) of all CYP involved will normally be notified of and involved in our response. However, where there is a police investigation, safeguarding enquiry, or where informing a responsible adult may place a child or others at risk or prejudice an investigation, advice will be sought from Children's Social Care and/or the Police before any information is shared. We will only share details relating to other CYP with family members who do not have parental responsibility where we have consent to do so, where there is another lawful basis for sharing the information, or where a decision has been taken by relevant agencies that sharing is necessary to safeguard a child (see also Record Keeping and Information Security)

15.18.2 The risk and needs assessment will inform the response taken. The following responses will be considered (more than one response may occur concurrently):

i. **Manage internally**

In alignment with the MAT Behaviour and Tackling Bullying […] Policy Procedures and school-specific appendices, and the Wave Reviews, address the needs/risks identified. Any consequences imposed on the CYP causing harm will be proportionately balanced with any other responses (such as police involvement) and take accounts of risks and needs as well as the ongoing impact on/risk to the CYP experiencing harm. This may also include actions to make locations/school infrastructure (including online) safer; adapting curriculum to ensure the school is teaching CYP how to keep safe or Working in Partnership.

ii. **Offer Family Help/Targeted Family Help**

Staff should be prepared to identify CYP and families who may benefit from Family Help and understand local referral processes. This could include offering and/or referring any CYP involved to enhanced or specialist support services to address the needs/risks identified in line with the Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership and locally available provision. Any referrals for support will require responsible adult (responsibility) consent and will take account of CYP's wishes and feelings.

iii. **Raise concerns to Children's Social Care** in line with the Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership

iv. **Report to the Police**

Trust schools will take account of When to call the police: guidance for schools and colleges.

15.19 **Recording and monitoring**

All child-on-child abuse concerns and responses will be recorded and stored on CPOMS for all involved CYP (please refer to Record Keeping and Information Security). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on either CPOMS (Primary and Specialist) or Arbor (Secondary). D/DSLs and Behaviour Leads will regularly review those incidents recorded on Arbor for patterns to ensure no indicators of child-on-child abuse, or abuse of any kind, is missed between systems.

15.20 **Child-to-Responsible adult Abuse**

15.20.1 Child-to-Responsible adult Abuse is a form of abuse in which a CYP uses violence, intimidation, threats, coercive behaviour or controlling behaviour towards a responsible adult or family member. This may include: Physical violence, emotional abuse, verbal abuse, threats or intimidation, damage to property, coercive or controlling behaviour and financial abuse.

15.20.2 The Trust recognises that Child-to-Responsible adult Abuse may be associated with unmet emotional needs, trauma, adverse childhood experiences, SEND, neurodiversity, exploitation, mental health difficulties or family stress.

15.20.3 All CYP involved will require a safeguarding response and staff must recognise that CYP displaying abusive behaviour may themselves be vulnerable and require support and protection.

15.20.4 Any concerns must be reported to the Designated Safeguarding Lead who will consider appropriate intervention through school-based support, Family Help, Children's Social Care or Child Protection processes as required.

15.20.5 The safety and wellbeing of all family members should be considered when assessing concerns.

16 Staff Safeguarding Concerns: Recognise, Respond, Report

16.1 Recognise

Be alert and curious.

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

Appearance

Behaviour

Communication.

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

16.1.1 Any CYP in any family could become a victim of abuse and/or harm. Abuse and safeguarding issues are complex and can often involve a CYP experiencing multiple issues or types of abuse. Staff should always maintain the attitude that abuse could happen here and practice professional curiosity. Staff should be particularly alert to CYP potentially at greater risk of harm and remain vigilant in identifying the signs and indicators which could indicate a concern that a CYP is being or could be at risk of abuse.

16.1.2 Staff must remain alert to indicators of serious violence, including weapon carrying, threats involving weapons, gang association, criminal exploitation, violent peer conflict, repeated assaults, significant behaviour changes, unexplained injuries and sudden changes in friendship groups. Any concerns must be recorded on CPOMS and reported immediately to the DSL/DDSL.

16.1.3 As well as maintaining their professional development, staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: Keeping children safe in education 2026: September 2026: Part 1 and Annex B. and SSCP - Contacts and Definitions.

16.1.4 Signs and indicators of concern may be evident in spaces and places where CYP spend time (including when online). They may be present in the CYP or others around them (including adults or CYP) in their appearance, behaviour and communication. Signs and indicators can be recognised by staff through:

i. **Concerns shared directly by a CYP:** staff *must not rely* on CYP telling them they are experiencing abuse. CYP may not recognise, feel ready, know how to, or be able to communicate concerns or worries. Staff must therefore act

in accordance with our safeguarding statement; work in partnership and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with CYP.

ii. **Observations:** in person or online (including online behaviour in school) of a CYP or someone else (for example a family member, someone working or visiting the school).

iii. **Concerns shared by others:** either verbally or in written communications. This could be family members, other CYP, other staff members or other adults who may be working in or with the school, or individual CYP.

iv. **Other systems we have in place:** including our filtering and monitoring systems and information from other agencies through working in partnership, etc.

16.1.5 There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the CYP is at risk of or experiencing abuse. Signs and indicators could be present for a variety of reasons as well as abuse, i.e., other family circumstances health or learning need, and may act as an early sign for the need for Family Help and support. In such circumstances, staff are still expected to respond in line with this policy. This will be explored in detail as part of the Wave Reviews.

16.1.6 Staff should recognise that many concerns will not immediately meet statutory safeguarding thresholds but may indicate a need for Family Help intervention. Early identification and support are essential in preventing escalation.

16.1.7 Staff should reassure CYP that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

16.2 Respond

Ensure the immediate safety of the CYP potentially at risk.

If there is immediate danger:

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

Apply other relevant policies/procedures (i.e., MAT Behaviour […] Policy and Procedures, MAT First Aid Policy; MAT Attendance Policy, MAT Staff Code of Conduct Policy and our response to child-on-child abuse, as applicable).

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

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

16.2.1 Immediate safety if a CYP is in immediate danger, staff must take individual action as necessary to keep the CYP, others, and themselves safe. They must:

i. contact emergency services if someone is in immediate danger (999).

ii. if necessary, refer child protection concerns themselves by following SSCP Procedures: Please report your urgent concerns to FPOC on 0345 678 902, If you have a non-urgent safeguarding concern please visit our Children's Referral Portal

iii. work in line with the MAT Behaviour […] Policy and Procedures and Use of reasonable force in schools guidance.

iv. report and allegations of harm by adults in a position of trust or unsafe practices in school in line with Ensuring Safe Staff.

16.2.2 Other relevant policies/processes

i. Staff may need to follow other school safeguarding policies/processes (see Legislation, Standards and Guidance) as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the CYP and any other CYP who may be at risk or involved, ensuring they act in their best interests. Where there are concerns of child-on-child abuse, Child-on-Child Abuse should be referred to.

16.2.3 Injuries incurred out of school

i. In primary settings, at the beginning of each session or school day, CYP's responsible adult(s) are requested to notify the school of any accidents, incidents or injuries which may affect their child before leaving them at the setting/school. A note will be made of any existing injuries and how the injury was received will be recorded. A body map may be used to indicate any marks/bruises (refer to body map on CPOMS or where this is not available, Shropshire Council Early Help Portal

ii. In secondary settings, injuries that have been sustained non-accidentally or may affect a CYP's ability to access the school site safely, should be reported to the school's office staff so that relevant staff can be informed and a Personal Emergency Evacuation Plan (PEEP) can be completed to

ensure the safety of the CYP on site (see Appendix B, MAT Supporting CYP with Medical Conditions Policy).

iii. Any serious injury occurring in the school/setting e.g., broken bone, is reported to Health and Safety Executive (HSE) via RIDDOR. This is also reported to Ofsted within 14 days.

16.2.4 **Seek views and gather information from the CYP and others**

i. Where safeguarding concerns are identified, staff should (where it is safe to do so) always seek the views of and directly from:

a. CYP (where appropriate and depending on the circumstances and their role with CYP)

b. any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see Record Keeping and Information Security)

c. those with responsible adult responsibility (if necessary and depending on the circumstances and their role).

ii. Any uncertainty about seeking views should be discussed with the DSL.

iii. If any need for help and support are identified, responsible adult(s) and CYP should always be asked for their consent to share information with other organisations so that help and support can be provided to them. If consent is not given, staff should follow guidance in the Recording Keeping and Information Security: sharing safeguarding information with others section.

i. Any uncertainty about seeking views should be discussed with the DSL. Decisions to share safeguarding concerns with other organisations without consent will be reported to and overseen by the DSL.

ii. If a CYP is non-verbal or not able to explain their views themselves due to their age, level of development or needs, then staff should pay attention to how the CYP may be expressing their views and feelings through their behaviour and use communication tools to help the CYP share their views. This support may be offered from the SENDCo or other agencies.

16.2.5 **When concerns are directly shared by a CYP**

i. CYP are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

ii. When CYP share the details of or feelings about abuse, the process of sharing can sometimes take time. CYP may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly but the CYP may share in the Appearance, Behaviour or other forms of Communication (see Recognise).

iii. It takes a lot of courage for CYP to share that they feel unsafe or are experiencing abuse. There are many reasons why CYP do not share their experience, i.e., uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding, or ability to recognise and explain their experience.

iv. When CYP are sharing their concerns, staff should:

- **Listen to the CYP:** please refer to this NSPCC poster.
- **Remain calm:** the CYP may stop sharing if they feel the staff member is upset or shocked by what the CYP is telling them.
- **Explain it can't be a secret;** staff must explain to the CYP that what they share has to be passed on, and to whom so that they can receive the best support. Think about when to do this to make sure the CYP feels safe and can continue to trust you and others.
- **Reassure** and offer comfort to the CYP (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the CYP is telling you or reprimand them if they decide not to share, or for not telling you before.
- **Seek the CYP's views:** use questions or communication tools that help the CYP to share from their own point of view. Gather information: do not investigate or assume what is happening to the CYP.
- **Explain** what will happen next. If you don't know everything that is going to be done, tell the CYP that you will make sure that they are kept informed.
- **Report and record** the conversation immediately as outlined in the Reporting concerns section.
- **Seek support if you feel distressed.**

16.3 Report

Where there is an immediate risk of significant harm, report immediately to the DSL.

Record your concerns, decisions, actions and outcomes on CPOMS.

When concerned about a member of staff or someone else in the school, report in line with Ensuring Safe Staff.

16.3.1 Record concerns

All safeguarding concerns must be recorded by the staff member in writing via CPOMS and the D/DSL alerted to the concern. Where physical injuries to a CYP form part of the evidence of the concern, staff will record information about the physical injuries observed on a Body Map (within the CPOMS incident log).

16.3.2 Each safeguarding concern record should include:

i. a clear and comprehensive summary of the concern.

ii. details of how the concern was followed up and resolved.

iii. any action taken, decisions reached and the outcome.

16.3.3 If staff are unsure of the recording requirements, they should seek advice from the DSL.

17 Designated Safeguarding Lead Response

17.1 Safeguarding concerns can be raised by staff as above, but may also be raised to the DSL by:

i. CYP, families, or visitors to the school.

ii. other agencies (see Working in Partnership).

iii. the school's ICT filtering and monitoring systems.

iv. see school-specific appendices for further methods of reporting.

17.2 The Designated Safeguarding Lead will:

i. consider and assess the concern.

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

- Keeping children safe in education 2026: September 2026
- Working together to safeguard Children 2026 (particularly Chapters 1 and 3)
- Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership
- other relevant local tools and pathways (West Midlands Procedures)
- When to Call the Police Guidance for Schools

iii. Decide on what action to take

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

17.2.2 In making decisions, the DSL will work in partnership with the Headteacher and other relevant staff in line with their roles and responsibilities, and any other organisations as appropriate (see Working in Partnership and Record Keeping and Information Security).

17.2.3 **Actions could include one or more of those listed below:**

i. Manage internally

In alignment with the MAT Behaviour and Tackling Bullying […] Policy Procedures and school-specific appendices, and the Wave Reviews, address

the needs/risks identified including offering support to the CYP and their family through the school pastoral support (Universal/School Family Help) offer in a way which addresses the needs/risks identified. Any consequences imposed on the CYP causing harm will be proportionately balanced with any other responses (such as Police involvement) and take accounts of risks and needs as well as the ongoing impact on/risk to the CYP experiencing harm. This may also include actions to make locations/school infrastructure (including online) safer; adapting curriculum to ensure the school is teaching CYP how to keep safe or Working in Partnership.

ii. Offer Family Help/Targeted Family Help

This could include offering and/or referring **any CYP involved** to enhanced or specialist support services to address the needs/risks identified in line with the Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnershipand locally available provision. Any referrals for support will require responsible adultal (responsibility) consent and will take account of CYP's wishes and feelings. Family Help interventions will be coordinated with reference to the Shropshire Family Help Together – A Framework for Action and local threshold guidance. Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership. Family Help is voluntary and consent-based in most circumstances. Where consent is not provided and safeguarding concerns remain, consideration will be given to whether statutory intervention or safeguarding referral is required.

iii. **Raise concerns to Children's Social Care** in line with the Family Help Together - A Framework for Action — Shropshire Safeguarding Community Partnership

iv. Report to the Police

Trust schools will take account of When to call the police: guidance for schools and colleges.

Where there is possible criminal behaviour by a CYP (including circumstances of child-on-child abuse), we will take account of when to call the police: guidance for schools and colleges.

Other local referral processes will also be followed as applicable including referring to relevant multi-agency forums and processes as outlined in relevant local tools and pathways, i.e. Prevent Radicalisation; ensure Online Safety; Multi-Agency Risk Assessment Conference).

17.3 **Record actions, decisions, and outcomes**

On the child protection file in CPOMS, and in line with Record Keeping and Information Security the DSL will record actions, decisions and outcomes. This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see Working in Partnership).

17.4 **Manage and oversee any ongoing response.**

Once the initial actions are taken, the DSL will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a CYP. Where this is decided, they will ensure that the school works in partnership with the CYP, families, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

The SSCP Escalation/Resolution of Professional Disagreements Policy will be used to challenge, resolve, and if necessary escalate any concerns the school may have when working with other agencies in safeguarding children.

18 Equality, Diversity Inclusion and Belonging

18.1 Our Equality, Diversity, Inclusion and Belonging Policy ensures the equality of education and opportunity for all CYP, irrespective of race, gender, disability, faith or religion or socio-economic background, or other protected characteristic. Repeated racist incidents or a single serious incident may lead to consideration under safeguarding CYP procedures. A separate log of these incidents will be kept and shared on a regular basis with Governors and the Local Authority. We also ensure emerging technologies, including AI, are used inclusively and do not reinforce bias or discrimination.

19 Health and safety

19.1 The Trust's Health and Safety Policy reflects the consideration we give to the safeguarding of our CYP both within the school environment and when away from the schools when undertaking school trips and visits.

19.2 **Sport -** Schools will ensure that participation in sport and physical education activities is planned and delivered in accordance with safeguarding duties, the Equality Act 2010 and relevant statutory guidance. Decisions relating to participation in single-sex sport will take account of safety, fairness, inclusion, welfare and safeguarding considerations. Where a CYP is questioning their gender, schools will consider requests for support on an individual basis, ensuring that safeguarding, welfare and the best interests of all children remain central to decision-making. All decisions and arrangements will be appropriately recorded and reviewed.

19.3 **Toilet Facilities-** Schools will provide toilet facilities in accordance with statutory requirements and safeguarding duties alongside assessing and managing safeguarding risks associated with all toilet facilities.

19.3.1 CYP must not be permitted to use toilet facilities designated for the opposite biological sex, including where a CYP is questioning their gender or where support for social transition is being considered.

19.3.2 Schools will provide separate toilet facilities for boys and girls aged eight years and over, except where a mixed-sex toilet facility is intended for one CYP at a time and can be secured from the inside.

19.3.3 Where a CYP does not wish to use facilities designated for their biological sex, schools will consider whether an alternative facility can be provided without compromising the provision of single-sex facilities. Decisions, rationale and arrangements will be clearly recorded, communicated appropriately and reviewed regularly.

19.4 **Changing Facilities**- The Trust will ensure suitable changing and shower facilities are available in accordance with statutory requirements, taking account of age, numbers of CYP, biological sex and any additional needs.

19.4.1 CYP aged 11 years or older at the start of the school year must not be required or permitted to undress in front of a CYP of the opposite biological sex.

19.4.2 CYP must not be permitted to access changing rooms or shower facilities designated for the opposite biological sex.

19.4.3 Where a CYP does not wish to use facilities designated for their biological sex, schools will consider whether alternative arrangements can be made which do

not compromise single-sex provision. This may include the use of a separate fully enclosed facility or access to facilities at different times.

19.4.4 19.4.4 All arrangements will be risk assessed, clearly documented, communicated where appropriate and reviewed regularly to ensure they remain suitable, proportionate and in the best interests of all CYP.

19.5 **Residential Visits, Overnight Stays and Accommodation**- When arranging educational visits, residential activities, field trips, camps, expeditions or any other activity involving overnight accommodation, schools will ensure arrangements promote safeguarding, privacy, dignity and welfare.

19.5.1 CYP will not be permitted to share overnight sleeping accommodation with a CYP of the opposite biological sex.

19.5.2 Schools will consider safeguarding duties, equality duties, the welfare of all CYP, privacy, dignity and any identified risks when allocating sleeping arrangements, including dormitories, tents, cabins, hotel rooms and shared accommodation.

19.5.3 Where a CYP does not wish to share accommodation with another CYP of the same biological sex, alternative arrangements will be considered wherever reasonably practicable.

19.5.4 Decisions relating to residential accommodation will be made on an individual basis, documented appropriately, risk assessed and reviewed where required.

19.5.5 Where requests form part of a wider request relating to social transition, schools will also have regard to the procedures contained within Section 14.11 CYP who are questioning their gender.

19.6 **Recording and Review- The DSL will be informed of any arrangements made under Section 19.**

19.6.1 Schools will maintain appropriate records of requests, discussions, decisions, risk assessments, support arrangements and reviews to ensure decisions remain lawful, proportionate, safeguarding-led and in the best interests of all CYP.

19.6.2 Schools will ensure compliance with the Terrorism (Protection of Premises) Act 2025 and any associated guidance relating to protective security, emergency planning and public protection duties.

20 Conclusion

20.1 The legal responsibility of the Trustees and the Local Governing Body of each school for safeguarding the welfare of CYP goes beyond basic child protection procedures.

20.2 The duty is to ensure that safeguarding permeates all activity and functions, surrounding and supporting their education and general welfare.

21 Reviewing the Safeguarding & Child Protection and Procedures Policy

21.1 This policy is subject to a regular cycle of monitoring evaluation and review by the Trust's Designated Safeguarding Lead each school's Designated Safeguarding Leads.

21.2 The policy should also be read alongside the Trust's other policies:

i. MAT Attendance Policy

ii. MAT Behaviour Policy & Procedures (incorporating tackling bullying, inclusion, personal development, support, exclusions and use of reasonable force & physical intervention)

iii. MAT GDPR Policy

iv. MAT Health and Safety Policy

v. MAT ICT Policy

vi. MAT Intimate Care Policy

vii. MAT Relationship, Sex and Health Education Policy

viii. MAT Recruitment & Selection Policy

ix. MAT Special Educational Needs and Disabilities Policy

x. MAT Staff Code of Conduct Policy

xi. MAT Supporting CYP with Medical Conditions Policy

xii. MAT Educational Visits

xiii. MAT Children Looked After, Previously Looked After and Care Experienced Policy

xiv. MAT Whistleblowing Policy

xv. MAT Lettings Policy

21.3 The Governors and Trustees receive an amended/updated policy annually.

22 Appendix A - Designated Leads for each school within the Marches Academy Trust & Link Governors for Safeguarding

i. All schools' lead contacts are published on school websites here: 'Get in Touch: Key Staff Contacts'
ii. Out of hours contact details will be made available to staff via email out of hours replies
iii. Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies and Safeguarding Partnerships via email out of hours replies

23 Appendix B - Learning for Life Framework

Marches Academy Trust

LEARNING FOR LIFE FRAMEWORK

	INCLUSIVE LEARNING	INCLUSIVE HEALTH & WELLBEING	INCLUSIVE INDIVIDUAL DEVELOPMENT	INCLUSIVE SAFEGUARDING & ATTENDANCE	INCLUSIVE COMMUNITIES
WAVE 4 | BESPOKE CYP on this wave require a bespoke approach (likely funded) comprised of one or more pillars of the LfL framework.	**WHO?** CYP WITH SPECIFIC NEEDS (EHCP | GSP); AND CYP WITH A SIGNIFICANT PROGRESS DEFICIT (SEE GUIDANCE P. 11) **WHAT?** Identify CYP who need a bespoke package and make necessary adjustments to ensure opportunities are not limited and that the intervention has impact so the disadvantage is not long term. Note, not all EHCP | SENS K CYP remain on this wave once the plan is effective	**WHO?** CYP WITH A HEALTH AND | OR WELLBEING NEED REQUIRING SIGNIFICANT ALTERATIONS **WHAT?** Recognise the difficulties of CYP with health and | or wellbeing need(s) responding with care and compassion. CYP has access to the support, learning and opportunities to feel safe & belong through a highly bespoke package. Any required funding or resource is sought | provided.	**WHO?** CYP WITH SPECIFIC VULNERABILITIES, WHETHER DIAGNOSED, LABELLED OR NOT (SEEN THROUGH LIKELY BEHAVIOURS) **WHAT?** CYP who need a bespoke package are identified and necessary adjustments are implemented to ensure opportunities are not limited and that disadvantage due to any vulnerability is not long term. Behaviour is not the primary focus but the indicator of need.	**WHO?** CYP WITH SIGNIFICANT AND SUSTAINED ABSENCE | RISK OF SIGNIFICANT HARM **WHAT?** Alert to CYP identified, ensuring there are carefully considered plans, relevant support documents in place with robust reviews (e.g. risk assessment) and immediate to report concerns. Low attendance is addressed through the graduated attendance response.	**WHO?** CYP OR FAMILIES AT RISK OF DISAFFECTION FROM THE COMMUNITY **WHAT?** The needs of individual CYP and families are considered broadly and bespoke plans are developed with CYP, families and partner agencies. Plans are likely to include Wave 4 for all other elements of the L4L and the broader community links.
WAVE 3 | PERSONALISED CYP on this wave require a personalised, person-centred approach comprised of one or more pillars of the LfL framework.	**WHO?** CYP REQUIRING PERSONALISED SUPPORT; AND CYP WITH A CONCERNING PROGRESS DEFICIT (SEE GUIDANCE P. 10) **WHAT?** Identify CYP need(s), understand how to support, share their profiles well across school and secure accessible learning to ensure achievement for all aspects. Gaps are regularly monitored at senior leader level; impact is a high priority and is timely.	**WHO?** CYP WITH A HEALTH AND | OR WELLBEING NEED THAT REQUIRES SPECIALIST SUPPORT **WHAT?** CYP are accessing learning in a compassionate and comfortable way. Full understanding to meet need(s) met by the school through well-considered and regularly reviewed plans. There is full co-operative working with CYP, families and professionals.	**WHO?** CYP REQUIRING PERSONALISED SUPPORT TO ALLOW THEM TO DEVELOP AND THRIVE IN ALL ASPECTS OF LIFE **WHAT?** Identify the CYP barrier(s) to thriving and outline an effective personalised plan to overcome them - focus on the barrier(s) and not just possible consequent behaviour(s). It is likely consent for external agency involvement is required - relational practice is necessary.	**WHO?** CYP WITH SUSTAINED ABSENCE RATES | CYP THAT REQUIRE SUPPORT TO STOP SIGNIFICANT HARM **WHAT?** All staff know what makes behaviours harmful, abusive, ensuring victims and perpetrators are carefully and regularly reviewed and referred for appropriate support. Where attendance is a barrier to accessing learning, it is managed as a priority.	**WHO?** CYP OR FAMILIES WHOSE ACCESS TO THE COMMUNITY HAS BEEN AFFECTED AND WARRANTS ADDITIONAL SUPPORT **WHAT?** Systems effectively involve families & forge school-home-agency links. Support to overcome barriers that inhibit familial involvement ensure cohesive and collaborative working to permit CYP access to school and specifically learning.
WAVE 2 | INTERVENTIONS CYP on this wave require a combination of adaptations and interventions in one or more pillars of the LfL framework.	**WHO?** CYP REQUIRING SPECIFIC INTERVENTIONS, CYP WITH A PROGRESS DEFICIT (SEE GUIDANCE P. 9) **WHAT?** Identify the CYP barrier(s) to learning and outline an effective intervention strategy to overcome them - focus on the barrier(s) and not just the consequent behaviour(s). Gaps are regularly monitored at senior leader level; impact is a high priority and is timely.	**WHO?** CYP WITH HEALTH AND | OR WELLBEING NEEDS WHICH REQUIRE ADDITIONAL CONSIDERATION AND SUPPORT **WHAT?** Schools have expansive knowledge and skillsets; CYP are identified and receive timely support. The curriculum design is adapted so all CYP can access learning and thrive and where is this is not enough, interventions are utilised to positively impact on individuals or groups.	**WHO?** CYP REQUIRING SPECIFIC INTERVENTIONS TO ALLOW THEM TO DEVELOP AND THRIVE IN ALL ASPECTS OF LIFE **WHAT?** Identify the CYP barrier(s) to thriving and outline an effective intervention strategy to overcome them - focus on the barrier(s) and not just possible consequent behaviour(s). Interventions are specific to individual, cohort and contextual needs.	**WHO?** CYP WITH ONGOING ABSENCE | CYP AT RISK OF NEGATIVE IMPACTS TO WELFARE AND | OR LIFE OUTCOMES **WHAT?** All staff, where concerns are sustained, implement appropriate and effective interventions to negate negative impact upon CYP life outcomes. Procedures are in place that prioritise attendance as an indicator of unmet needs and ALL absence is tightly reviewed.	**WHO?** CYP OR FAMILIES THAT REQUIRE SPECIFIC SUPPORT FOR SMART PERIODS **WHAT?** Systems effectively involve families & forge school-home links. Interventions to overcome barriers that inhibit familial involvement ensure active involvement to permit CYP access to school and specifically learning.
WAVE 1 | ADAPTATIONS CYP on this wave require adaptations in one or more pillars of the LfL framework.	**WHO?** CYP WHERE PROGRESS DEFICIT EMERGING (SEE GUIDANCE P. 8) **WHAT?** Assess need(s) and plan adaptations to meet them. Where CYP are unable to attend the physical teaching space make adaptions to allow continued access to the curriculum. Gaps are understood and adjustments ensure they are closing.	**WHO?** CYP WHERE OBSERVATIONS, INCIDENTS AND BEHAVIOURS ARE STARTING TO EMERGE THAT INDICATE A STRUGGLE TO THRIVE **WHAT?** Assess, understand and adapt to support the barrier(s) to positive health (incl. mental) and wellbeing. Support CYP to utilise self-care in addition to developing skills and strategies to thrive.	**WHO?** CYP WHERE THERE ARE INSECURITIES IN DEVELOPMENT, SENSE OF IDENTITY OR BELONGING, OR ACCESSIBILITY IS RESTRICTED **WHAT?** Emerging concerns are recognised and responded to through adaptive approaches. Equality, diversity, inclusion and belonging is lived through all aspects of the school and all barriers have clear strategies to allow those with factors affecting accessibility to thrive.	**WHO?** CYP WITH EMERGING ATTENDANCE CONCERNS | CYP WHERE CONCERNS ARE EMERGING **WHAT?** Emerging concerns are recognised, recorded and relevant parties alerted. Homes are supported and adaptations to CYP provision are implemented. CYP barriers to attendance and punctuality are assessed and understood, and adaptations are implemented.	**WHO?** CYP AND FAMILIES THAT REQUIRE ADAPTED PROVISION AND ADDITIONAL RESOURCES TO ACCESS THE UNIVERSAL OFFER **WHAT?** Strong systems and strategic programmes involve families in school-led or partnered community programmes. Programmes are planned around ongoing family needs such as family-focused learning.
PRE-WAVE | UNIVERSAL All CYP have access to the universal offer and for CYP on this wave, their needs are being met.	**WHO?** CYP ACCESSING THE CURRICULUM EFFECTIVELY AND DEMONSTRATING AGE-RELATED EXPECTED PROGRESS **WHAT?** All needs are met through quality first teaching and CYP supported to thrive. Reading skills and functional skills are not a barrier to learning. Where CYP are unable to attend the physical teaching space, CYP can access the curriculum(s) remotely or otherwise.	**WHO?** CYP WHO DEMONSTRATE POSITIVE MENTAL HEALTH AND WELLBEING, OR SELF-CARE STRATEGIES TO WEATHER NEGATIVE PERIODS **WHAT?** CYP voices are heard, they thrive in their school community and feel a sense of belonging and inclusion. They are learn to provide self-care, and develop skills in caring for others. They contrinute to the culture of their school positively, and drive change where beneficial.	**WHO?** CYP HAVE SECURE IDENTITIES AND RATES OF DEVELOPMENT, AND CAN ACCESS AND INFLUENCE ALL CURRICULUM, TAUGHT OR LIVED **WHAT?** CYP are supported to thrive through quality PSHE, RSHE and development programs. Enrichment and extra curricular offers are strong. CEIAG and preparation for the next phase is well-executed. Where potential barriers to accessing opportunities, are understood and addressed in the curriculum. CYP voices are heard and inform change.	WHO? CYP WITHOUT ADDITIONAL NEEDS OR ATTENDANCE ISSUES – CYP CAN THRIVE AS THERE ARE NO CONCERNS **WHAT?** All staff receive training, regular updates & are aware of concerns | symptoms that may require additional services, and can signpost CYP and parents | carers to these. Patterns of absence are identified early and specific groups tracked tightly.	**WHO?** CYP, FAMILIES, SCHOOLS AND COMMUNITIES **WHAT?** Schools have a SCP (School Community Plan) that details a clear understanding of the contextual needs (see safeguarding and attendance pillar) and community engagement and they are the heart of the community. Community engagement is a whole school approach.
	Access supporting documents, policies and links for this pillar of the framework.	Access supporting documents, policies and links for this pillar of the framework.	Access supporting documents, policies and links for this pillar of the framework.	Access supporting documents, policies and links for this pillar of the framework.	Access supporting documents, policies and links for this pillar of the framework.

EVERYONE MATTERS - BUILDING BLOCKS TO BELONGING: A CULTURE OF CARING FOR ALL

This includes, but is not limited to:
strong universal offers focused on relational approaches | inclusive, broad and context-aware curriculums | cohesive infrastructures | clear, centralised data tracked through ASSESS, PLAN, DO, REFLECT |

24 Appendix C – File Transfer Record and Receipt

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

NAME OF CHILD OR YOUNG PERSON:	
DOB:	
NAME OF SCHOOL/SETTING SENDING CP FILE:	
ADDRESS OF SCHOOL/SETTING SENDING CP FILE:	
METHOD OF DELIVERY:	1. BY HAND 2. SECURE POST 3. ELECTRONICALLY
DATE FILE SENT:	
NAME OF DSL TRANSFERRING FILE:	
NAME OF PERSON TRANFERRING TO:	
SIGNATURE:	

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

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

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

25 Appendix D - Serious injuries, accidents and illnesses

Applicable to early years settings only

The setting must tell Ofsted about any of the following in relation to serious injuries, accidents and illnesses:

i. the death of a child
ii. anything that requires resuscitation
iii. admittance to hospital for more than 24 hours
iv. a broken bone or fracture
v. dislocation of any major joint, such as the shoulder, knee, hip or elbow
vi. any loss of consciousness
vii. severe breathing difficulties, including asphyxia
viii. anything leading to hypothermia or heat-induced illness
ix. any confirmed cases of coronavirus (COVID-19) in staff or CYP

Minor injuries

The setting does not need to tell Ofsted about minor injuries, even if treated at a hospital (for less than 24 hours). These include:

i. animal and insect bites, such as a bee sting that does not cause an allergic reaction
ii. sprains, strains and bruising, for example if a child sprains their wrist tripping over their shoelaces
iii. cuts and grazes
iv. minor burns and scalds
v. dislocation of minor joints, such as a finger or toe
vi. wound infections

Eyes

The setting must report to Ofsted if a CYP suffers any loss of sight, whether it is temporary or permanent. You must also tell us about any:

i. penetrating injury to the child's eye
ii. chemical or hot metal burn to the child's eye

Substances and electricity

If a CYP in our care suffers any injury from, or requires medical treatment for, any of the following situations we must tell Ofsted:

i. from absorption of any substance:
    - by inhalation
    - by ingestion
    - through the skin
ii. from an electric shock or electrical burn
iii. where there is reason to believe it resulted from exposure to:
    - a harmful substance
    - a biological agent
    - a toxin
    - an infected material

The setting must fulfil our legal requirements and submit the online report to Ofsted as soon as reasonably practicable, but no later than 14 days by completing the online reporting process at **https://www.gov.uk/guidance/report-a-serious-childcare-incident**

26 Appendix E - Alternative Provision Quality Assurance Checklist

Marches Academy Trust

Name of alternative provision:

Name of person completing checklist (from host school):

This quality assurance document must be completed **prior** to working with a new alternative provision and **annually** thereafter, with regular site visits throughout the year (**at least termly**). Where certificates or evidence cease to be valid, renewals are to be collated throughout the academic year. Where provisions are multi-site, evidence and visits to be collated for each site where CYP attend.

1. List of Documentation to be Obtained from Alternative Provision

1. **Safeguarding Documentation:**	**Y/N**	**Date & initial**
Signed copy of Service Level Agreement (SLA)		
Signed copy of Annual School Registration declaration		
Copy of Safeguarding/Child Protection Policy		
Record of training for the Designated Safeguarding Lead (DSL)		
Acceptable technology use policy		
Lone working procedure and risk assessment		
2. **Health & Safety Documentation:**	**Y/N**	**Date & initial**
Copy of Health & Safety Policy incl. Fire risk assessment		
Public liability insurance (minimum £5 million)		
Fire safety and extinguishers documentation		
Site plan and risk assessment		
Regular PAT testing and water system tests		
Asbestos log (if required)		
Cleaning and chemical storage risk assessments		
3. **Educational Provision Documentation:**	**Y/N**	**Date & initial**
Copy of curriculum outline and organisation		
Behaviour policy supporting personal development		
Details of the available qualifications and training		
4. **Progress Tracking and Communication:**	**Y/N**	**Date & initial**
Procedures for tracking attendance and reporting absences		
Progress reports and communication with responsible adult(s)		
Risk assessments for all activities		
Weekly progress reports		
Referral form with a detailed pupil profile		
5. **Other Policies and Documents:**	**Y/N**	**Date & initial**
Training certificates (Safeguarding, Prevent, FGM Physical Intervention)		
ICT and mobile phone usage policy		

Governance and leadership structure		
Complaints procedure		

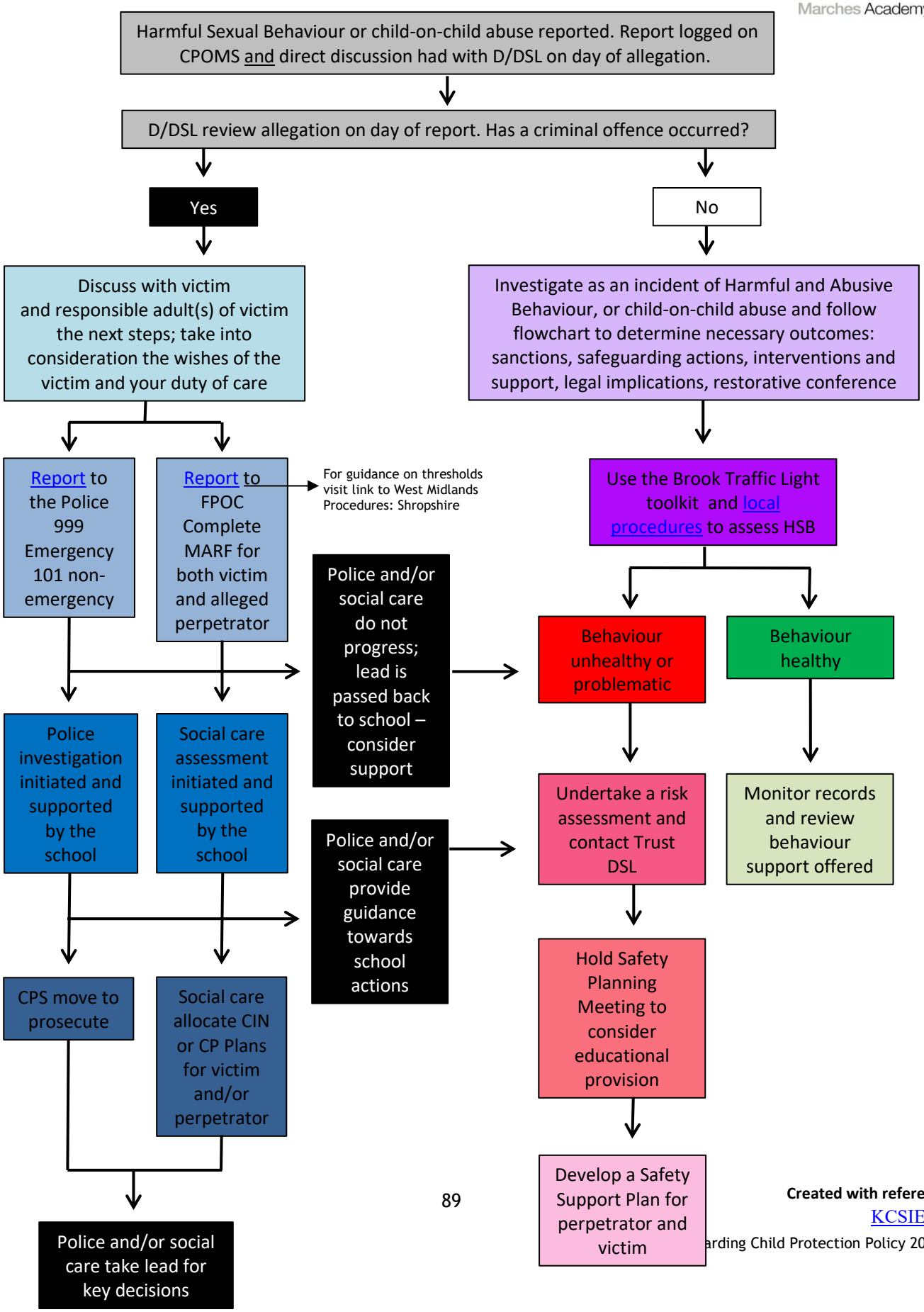
2. Checklist for Quality Assurance during Site Visit

Section	Requirement	Rating 1 = Unsatisfactory 2 = Requires Action 3 = Satisfactory			Comments or Actions Needed
Safeguarding	Service Level Agreement signed	1	2	3	
	Safe and secure site (staff DBS checks, visitor protocol)	1	2	3	
	Safeguarding/Child Protection policies shared	1	2	3	
	Staff safeguarding training and knowledge	1	2	3	
	Acceptable technology use policy in place	1	2	3	
	Lone working procedure and risk assessment	1	2	3	
Health & Safety	Site is safe and secure	1	2	3	
	Appropriate risk assessments	1	2	3	
	Fire and emergency procedures	1	2	3	
	Public liability insurance available	1	2	3	
	First aid provision and qualified first aiders	1	2	3	
	Suitable equipment is available	1	2	3	
Educational Provision and Tracking of Progress	Clear outline of qualifications and training	1	2	3	
	Pupil profile shared from school utilised	1	2	3	
	Child-centred approach to admission and learning	1	2	3	
	Pupils feel safe and supported at all times	1	2	3	
	Progress regularly assessed and shared	1	2	3	
	Adequate access to educational resources	1	2	3	
	Inclusive practice with behaviour management	1	2	3	
Leadership & Management	Clear governance and leadership structure	1	2	3	
	Communication maintained with referring school	1	2	3	
	Attendance at multi-agency meetings	1	2	3	
	Provider feedback on host school collaboration	1	2	3	

Signed by host school _____Date _____

Signed by Alternative Provision _____Date_____

27 Appendix F - Workflow for managing reported incidents of child-on-child abuse in schools



Marches Academy Trust

Created with reference to:
KCSIE, 2025
arding Child Protection Policy 2026

28 Appendix G - Workflow for responding to child-on-child abuse in schools

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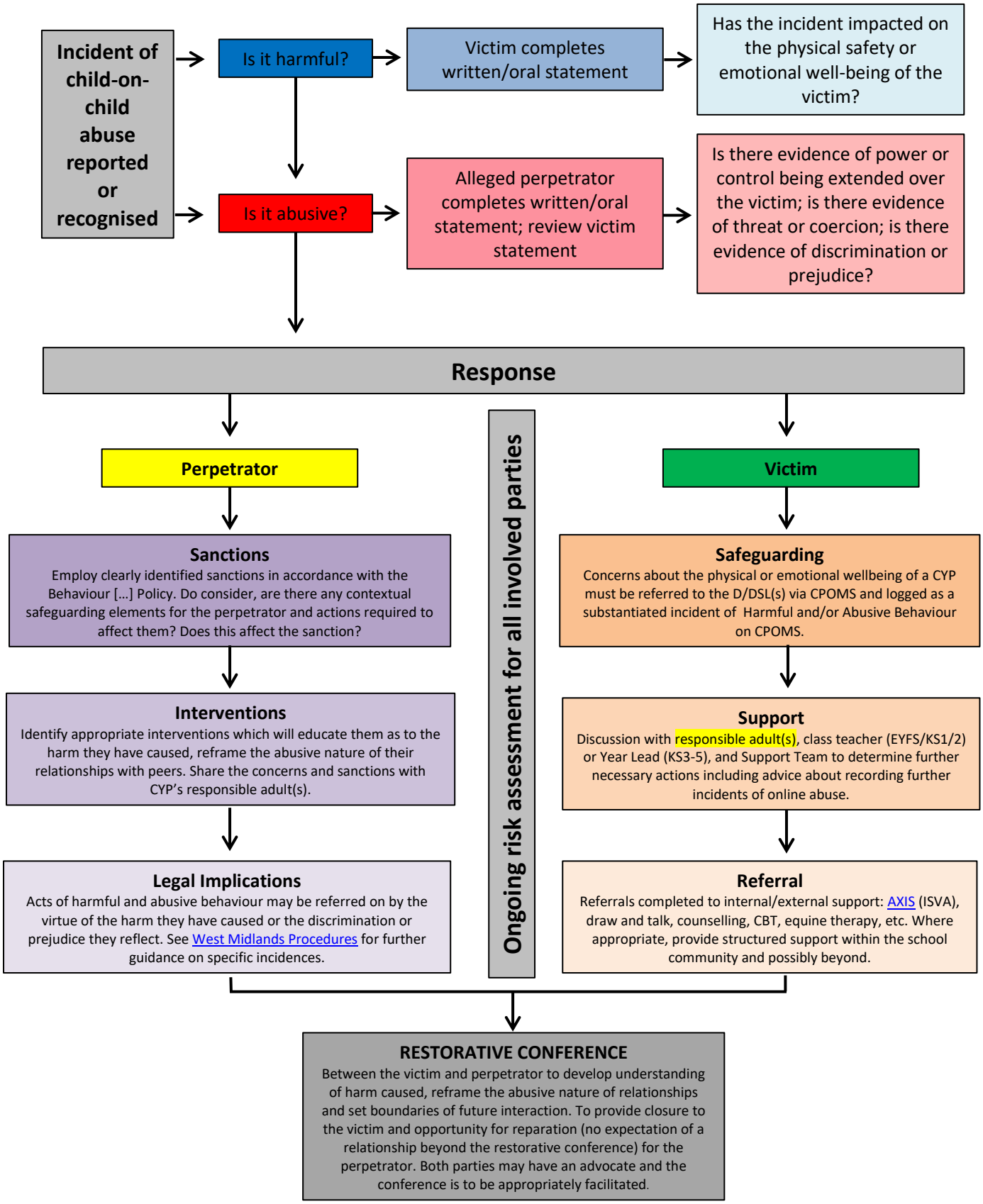

29 Appendix H - Child-on-child sexual abuse: risk & needs assessment and version record

Notes on using this template:

Adapted from The Key

Marches Academy Trust

(1) We've used "Child A" and "Child B" to signify the CYP involved, rather than saying "victim" and "alleged perpetrator". This is because you should avoid assigning guilt until a formal investigation has been conducted by the appropriate authorities.

(2) Consider each question/consideration from the perspective of both CYP (in cases of multiple CYP, please outline in 'additional information' and add to the 'further comments' additional information as required) and be sure to do this in collaboration with them. Also consider the impact on, and needs of, the wider school community, and record any concerns or actions in the most appropriate column.

(3) Work with your local multi-agency safeguarding team (MAST) when conducting this risk assessment and update it in response to any advice they provide. Some of the prompts may require input from other MAST agencies. Add specific questions and considerations based on the nature of each incident and on the advice provided.

(4) Keep track of the changes you make (do not overwrite the original):

- Create a new copy of the document
- Update the version number at the top of the risk assessment
- Record what has changed in the update log (at the end of the document)
- Save the most recent version of the risk assessment in the appropriate places (for example, CPOMS [scan] or the child's safeguarding file)

(5) This should be a living document – you may need to update it as often as daily based on conversations with, and feedback from, the CYP and CYP's responsible adult(s) involved, feedback from staff, guidance from the MAST, or information from the police and children's social care.

Child A	
Child B	
Incident Number on CPOMS	
CPOMS Incident Date	
Additional Information (including details of other CYP involved if necessary and appropriate)	

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES
Details of the incident Record details of the incident from the point of view of both CYP	• How serious is the incident? Was it a crime? • Do we need to make arrangements to limit contact between the CYP involved? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes) • How did the school find out about it? Was it reported directly or by someone else with knowledge of the incident?			Use this column to record additional information that may be relevant For example, previous, unrelated behavioural incidents
Social risks	• Do the CYP share a peer group? Are people in their friend group likely to take sides? • Do they both attend your school? • Do other people know about the incident? Do those people understand: ▪ Who they can talk to when they have concerns about the people involved, or about their own safety and wellbeing ▪ The importance of confidentiality ▪ If, and how, they may need to be involved in any further investigations • Are they likely to be the subject of gossip, bullying or further harassment? • Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)? • Do they risk being alienated from their friend group(s) as a result of this incident?			

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES
Physical risks	• Do they feel, or continue to feel, physically threatened by the other CYP? • Do you have reason to believe they pose a continued risk to the safety and wellbeing of the victim, or other CYP and staff? • Are they at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers) • Do they share classes/break times/etc.? • Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? How can such contact be limited?			

Environmental risks	• Do they live in a home where violence or abuse has occurred?
	• Do they live in or near an area or location known to police to be high risk for sexual harassment or assault?
	• Are they active on social media? If so, how? Do they know how to protect themselves from online grooming?
	• What activities do they take part in outside of school?
	• Are the CYP's responsible adult(s) clear about:
	  ▪ How the school (and partner agencies) are handling the incident?
	  ▪ Confidentiality?
	  ▪ The conduct expected of them while an investigation is ongoing?			

Further actions or comments:

Hazard/Risk		What impact could the hazard/risk have?	Normal control measures:	Additional control measures:	Are control measures		Assigned to:
					Adequate (Y/N/NA)	In place (date as complete)	
1							
2							
3							

All parties involved in the completion of this risk and needs assessment:

Name	**Role** (this, for any responsible adult(s), should be 'mother of Child A', etc.

Completed by: _____ Signature: _____ Date: _____

Authorised by: _____ Signature: _____ Date: _____

Authorisation must be sought from the DSL or Headteacher and a copy sent to Trust DSL as an encrypted email. Where the person completing the document is the DSL or Headteacher, it needs to be countersigned by another DDSL to ensure all appropriate measures have been considered. Upload a scanned version to CPOMS as a new incident or action of a previous incident and ensure confidentiality via tags. Ensure all actions communicated to respective personnel to guarantee the risk and need assessment is actioned correctly and effectively.

30 Appendix I - Safeguarding Assurance Document

Safeguarding Assurance
September 2025

Marches Academy Trust

Marches Academy Trust provides a high-quality education provision for CYP attending all Trust schools.

This document outlines the structures, systems, processes, and protocols implemented to assure that it is meeting all requirements to safeguard CYP effectively and demonstrate good practice.

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
1. Trustees	A	There is a Trustee named as Lead for Safeguarding. The Trustee has extensive experience and meets half-termly with the Marches Academy Trust (MAT) Designated Safeguarding Lead (DSL).	Trustee Notes *Half-termly*							
	B	Training on KSCIE and updates, Trust Safeguarding and Child Protection Policy and Procedures, and Governing Safeguarding (non-link governors) provided by the MAT Safeguarding Lead.	MAT Training Tracker *As appropriate (when training occurs)*							
	C	Education Standards Committee review safeguarding via termly meetings; this information is provided by the Executive Director of Education (MAT DSL).	ESC Minutes							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
2. Executive Leadership Group	**A**	A member of the Executive Leadership Group (ELG), Executive Director of Education, is the MAT's Designated Lead for Safeguarding and provides regular updates to the ELG. Responsibility for safeguarding is shared amongst DDSOs in the Executive Team and Director of Safeguarding responsible for overseeing safeguarding operations, development and quality assurance.	*Weekly*							
	B	All centrally determined policies, procedures and protocols are agreed by the Executive Leadership group prior to implementation.	*As appropriate (when changes occur)*							
	C	All schools have an Executive Link as check-in partner; Executive Links for schools are actively involved in the Executive Reviews completed termly. MAT DSL contributes to all Executive Reviews.	Executive Leadership Group minutes *Termly*							
3. HR	**A**	MAT meets its statutory requirements in relation to criminal record (DBS) checks and associated pre-employment checks.	Single Central Record *As appropriate (when changes occur)*							
	B	Induction training program includes a safeguarding briefing and Raising Awareness Child Protection Level 1 training for all staff, including those not in regulated activity.	Trust Training Tracker *As appropriate (when training occurs)*							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
	C	Headteachers and administrators are trained on their role requirements in completing the Single Central Record (SCR). Head of HR completes a report of compliance of the SCR annually evidenced by sampling school records.	*Annually*							
	D	Headteachers and those involved with school recruitment are trained in Safer Recruitment. The Recruitment & Selection (R&S) Policy and related R&S Toolkits are updated annually to further support safer recruitment.	*Annually*							
4. Central Services and all MAT schools	**A**	All staff have undertaken and are up to date with safeguarding training, both core and subject-specific subjects or themes (harmful sexual behaviours, Brook Traffic Light Tool, Child Exploitation (including Sexual), Domestic Abuse and Coercion, Neglect, etc.) This is delivered by either a trained member of the safeguarding team, the Local Family Help training offer, or a commissioned expert in the area, i.e., an NSPCC trainer or member of the Local Safeguarding Childrens Partnership.	MAT or school-specific training tracker (incl. Arbor) *As need arises*							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
5. MAT Designated Safeguarding Lead (DSL)	**A**	The MAT Safeguarding Lead is an experienced Designated Safeguarding Lead with extensive safeguarding experience. The MAT DSL is a trained Ofsted Inspector who also sits within the Local Authority (LA) SEND and AP Partnership Board, attends termly LA Safeguarding Networks, provides training and consultancy to schools outside the MAT on inclusive practice and school improvement, including safeguarding as an area of specialism.	Personnel files							
	B	The MAT DSL/ Director for Safeguarding write and annually updates (or more regularly where necessary) the Safeguarding and Child Protection Policy and Procedures in response to Local Safeguarding Children's Partnerships and national guidance, i.e., KCSIE. Schools then specify their school-specific processes and protocols in their school-specific appendices.	Trust Governance Officer – policies Schools' specific training trackers *Annually (or more regularly, where required)*							
	C	The MAT DSL provides an annual update (following KCSIE or other statutory updates) training, written centrally, as a template for schools' specific additional training, which is delivered on the first INSET session in September of each academic year.	MAT Inclusions Area *Annually*							
	D	The MAT DSL quality assures all schools' Prevent Risk Assessments and Community Safeguarding Plans.	MAT Inclusions Area *Annually*							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
	E	The MAT DSL provides a MAT specific safeguarding review file for all settings which are completed and submitted for review termly as part of the School Improvement Record, within the School Overview File.	MAT Inclusions Area *Annually*							
	F	The MAT DSL quality assures (QA) the Section 9 and Section 11 ensures those called for LA QA are submitted on time.	MAT Inclusions Area *Annually*							
	G	School reviews evaluate schools' protocols, processes, and levels of compliance. This includes a review of the SCR, personnel files, the School Overview File, specifically the KPI, and other relevant platforms (Arbor, CPOMS) and documentation.	MAT Inclusions Area *Annually*							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
	H	The MAT DSL coordinates MATi Scoping (VSR) termly (Autumn 2; Spring 2; Summer 2) to review the provision for the most vulnerable CYP (CYP); this focuses on the schools' absenteeism, suspensions, permanent exclusions, higher needs funding (SEND), access to Alternative Provision (AP) and person-centred plans, and is particularly focused on the experiences of SEND (E and K), Pupil Premium (PP), Children Previously or currently Looked After (P/CLA), those with a Social Worker (SW), those on an Family Help (in-house or Targeted) Plan, or those who are trauma-experienced. This focuses on the model of check (compliance, effectiveness and planning); challenge, and champion (escalating to the ELG or other agencies where necessary). This includes support with the Escalation Policy where agencies are not fulfilling their duty of care.	MAT Inclusions Area *Termly*							
	I	Following the School Reviews, the ELG meets with Headteachers of all schools to agree the school improvement support required. This is delivered through school-specific support, CPD training, twilights, professional learning modules, etc., and these are agreed in an Executive Review, termly. This includes any support required regarding safeguarding delivered by the MAT DSL or other delegated, and expertly trained professional.	School Review files *Termly (rolling)*							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
	J	The MAT DSL provides a networking opportunity to all schools to share updates, concerns, and best practice.	MAT Inclusions Area via TEAMS *Termly*							
	K	The MAT DSL provides a central resource base for training materials and updates to the Learning for Life Framework and WAVE Guidance to support schools in decision making and access to support and services, including those related to safeguarding.	MAT Inclusions Area *Updates when necessary*							
	L	The MAT DSL provides LGB with proformas to ensure that they can check, challenge and champion the schools they govern to ensure schools are both compliant and effective with regards to their statutory requirements, including safeguarding.	MAT Inclusions Area							
	M	The MAT DSL provides schools with proformas for a termly and annual update on their statutory requirements, including safeguarding.	MAT Inclusions Area							
	N	The MAT DSL delivers half-termly MATi Scoping update to the ELG.	ELG minutes *Half-termly*							
	O	The MAT DSL provides termly safeguarding report to trustees.	BOT minutes *Termly*							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
	P	The MAT DSL provides annual training, available to all trustees and members of school LGBs on effective governance of safeguarding. The MAT DSL offers support to governors upon request regarding safeguarding and effectively checking, challenging and championing safeguarding within their respective school(s).								
6. Education Improvement Director	**A**	MyVoice survey and OurVoice discussion completed of CYP including checks regarding statutory expectation and requirements.	MAT Inclusions Area *Annual*							
	B	Half-termly update on wellbeing and support.	MAT Update (Friday) *Half-termly*							
7. Director of Information Management and Attendance	**A**	Termly Safeguarding and Attendance Review completed in all schools.	School Review files *Termly*							
8. Schools	**A**	Each MAT school has a named link governor for safeguarding who undertakes training as part of their role, and a DSL with a team of deputies, who undertake training at least biennially.	Schools' specific training tracker and personnel files							

Responsible Professional(s)	Action		How often, and where is this recorded?	Systems	Autumn 1	Autumn 2	Spring 1	Spring 2	Summer 1	Summer 2
	B	Each MAT school reviews the safeguarding processes, protocols and compliance at least termly and submits a report to the LGB outlining their position. Included in the cycle is a summary of behaviour and wellbeing ensuring a holistic view of safeguarding and welfare for the most vulnerable CYP is presented.	LGB minutes *Half-termly*							

31 Appendix J Useful Safeguarding Resources

- https://www.operationencompass.org
- https://www.ceop.police.uk
- https://saferinternet.org.uk
- https://www.iwf.org.uk
- https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/
- https://youthendowmentfund.org.uk
- https://www.gov.uk/government/publications/families-first-partnership-programme-guide
- https://ico.org.uk/for-organisations/
- **UK Safer Internet Centre-** https://saferinternet.org.uk
- **Education for a Connected World-** https://www.gov.uk/government/publications/education-for-a-connected-world
- **Internet Watch Foundation-** https://www.iwf.org.uk
- **DfE Generative AI Guidance-** https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education
- **DfE Digital Standards-** https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges
- **NCSC Cyber Security for Schools-**https://www.ncsc.gov.uk/section/education-skills/cyber-security-schools-

- **NCSC Training for School Staff-** https://www.ncsc.gov.uk/information/cyber-security-training-schools
- **UKCIS Sharing Nudes and Semi-Nudes Guidance** https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
- **NSPCC Harmful Sexual Behaviour-** https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour
- **DfE Mental Health and Behaviour in Schools-** https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2
- **NHS Mental Health Support-** https://www.nhs.uk/mental-health/