The Rivers C.of E. Academy Trust

Safeguarding and Child Protection Policy

St Peter's Droitwich C.of E. Academy

Committee	Full Trust Board
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Officer Responsible	Director of Inclusion

This document sets out the regulations for the MAT and all member academies

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Key Contacts

The Rivers C.of E. Academy Trust

- Safeguarding and Child Protection Link Trustee — Rachael Paige
- Executive Team Safeguarding Lead — Sally Philpotts
- Trust Safeguarding Lead — Amy Dobson
- Hub Director — Kerry Postans

School/Setting

- Designated Safeguarding Lead (DSL) — Sarah Mason

- Deputy Designated Safeguarding Lead (DDSL): Lucy Mills
- Deputy Designated Safeguarding Lead (DDSL): Caroline Sims

- The Headteacher/Head of Setting: Sarah Mason
- Designated Teacher for Looked After Children: Caroline Sims
- Special Educational Needs Co-ordinator (SENCO): Lucy Mills
- Medial Lead/Allergy Lead: Lucy Mills
- Senior Mental Health Lead: Caroline Sims
- Online Safety Co-ordinator: Alice Todd

Local Authority and External Agencies

Schools/settings will often have children attending who live within a different Local Authority to the location of the school/setting. Staff know and understand that there are different reporting procedures for their own, and neighbouring, Local Authorities.

The school/setting will continue to liaise with their own Local Authority Children's Services, and the DSL will keep up to date with information from the neighbouring Local Authorities.

Appendix A contains the contact details of Local Authorities, and national external agencies, for schools/settings within The Rivers C.of E. Academy Trust.

Introduction

The Rivers C.of E. Academy Trust is committed to ensuring the welfare and safety of all children accessing any of our school and nursery settings. This policy applies to all staff (teaching and non-teaching), temporary/supply/visiting staff, plus volunteers including our advocates and trustees.

We believe that pupils have a right to learn in a supportive, caring and safe environment which includes the right to protection from all types of abuse; where adults are vigilant for signs of any pupil in distress and are confident about applying our safeguarding processes to avert and alleviate any such problems.

The Rivers C.of E. Academy Trust's Safeguarding and Child Protection Policy is designed to meet both statutory requirements plus the day-to-day needs of our schools and their stakeholders (pupils, parents/carers, staff, Local Authorities and related agencies).

Vision and Values

The Rivers C.of E. Academy Trust is committed to providing an extraordinary education for every pupil, underpinned by our key themes of **Extraordinary Education, Extraordinary People, and Extraordinary Futures**.

We are dedicated to creating and maintaining a safe, caring, and inclusive environment where the welfare of children and young people is paramount. We believe that every child has the right to feel safe, valued, respected, and supported to achieve their full potential.

We foster a culture of vigilance, openness, and accountability in which all staff, volunteers and stakeholders understand their safeguarding responsibilities and feel confident to raise concerns about the safety and wellbeing of children. We are committed to ensuring that concerns are acted upon promptly, appropriately, and in the best interests of the child.

Our values promote collaboration, trust, respect, and continuous learning, enabling all members of our community to contribute to a strong safeguarding culture. Through effective partnership working with families, carers, and external agencies, we strive to protect children from harm and ensure they receive the support they need to thrive.

We recognise that safeguarding is everyone's responsibility and that maintaining a culture of openness, trust, and professional curiosity is essential to protecting children and achieving our shared vision of excellence.

Aims

This policy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.

- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- Staff maintain a vigilant attitude of "it could happen here".

Legislation

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on further legislation which is listed within Appendix B. This policy also complies with our funding agreement and articles of association.

Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix C explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix C defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

Staff referred to within this policy covers all staff within each school/setting, across a Hub and within the Rivers C.of E. Academy Trust Central Team. This includes both teaching and non-teaching staff, as well as those who are temporary, supply, agency or visiting staff.

Three safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). The following partners make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority.
- Integrated Care Boards (ICB) - previously known as clinical commissioning groups for an area within the Local Authority.
- The chief officer of police for an area in the Local Authority area.

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 child involved feels most comfortable with.

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 children) 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.

Equality Statement

Within our safeguarding policy and practices, we acknowledge that some children may have an increased risk of abuse, both online and offline. Additional barriers can exist for some children in respect to recognising or disclosing abuse.

Our schools/settings are unwavering in their dedication to anti-discriminatory practice, valuing and considering the diverse circumstances that children and young people may experience.

We ensure that all children have the same protection, regardless of any barriers they may face, giving special consideration to children who:

- Have Special Educational Needs and Disabilities (SEND) or additional health conditions.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Have a family member in prison or are affected by parental offending.
- Are showing signs of being drawn into antisocial or criminal behaviour.
- Are at risk of female genital mutilation (FGM), forced marriage, or so-called honour-based abuse.
- Are at risk of radicalisation or exploitation.
- Are asylum seekers or refugees.

- Have English as an additional language (EAL).
- Are at risk due to either their own or a family member's mental health needs.
- Are young carers.
- Are looked after or previously looked after.
- Are frequently missing from care or home.
- Are missing or absent from education for prolonged periods and/or frequently.
- Have a parent/carer that has expressed an intention to remove them from school to be home educated.

Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility.

This policy applies to all staff and volunteers including our advocates and trustees. It is aligned with the protocols and procedures established by the three safeguarding partners, ensuring a comprehensive and uniform approach to safeguarding practices.

Our policy and procedures also apply to extended school sessions, including extra-curricular opportunities and off-site activities.

We recognise the pivotal role the school/setting plays within preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

This will be underpinned by our:

- Behaviour Policy.
- Pastoral support system.
- Planned programme of Relationships, Sex and Health Education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.

- What constitutes sexual harassment and sexual violence and why they are always unacceptable.

The school/setting takes account of local contextual safeguarding risks and regularly reviews local data, including information available through the Police (https://www.police.uk), to identify emerging issues and inform setting-specific safeguarding responses, support, and interventions based on identified needs.

All Staff and Volunteers

Staff and volunteers (including our advocates and trustees) have a responsibility to:

- Read and understand at least Part 1 of the DfE's statutory safeguarding guidance Keeping Children Safe in Education (2026).
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance.
- Ensure that their safeguarding and child protection training is up to date - attending all relevant training and development, including completion of their school/setting induction.

Consider, at all times, what is in the best interests of the child, maintaining an attitude of "it could happen here".

- Provide and maintain a safe environment in which all children can learn.
- Observe and comply with the staff code of conduct.
- Know who the school/setting's DSL and DDSL(s) are and how to contact them.
- Keep themselves updated with the systems within the school/setting which support safeguarding that were explained to them as part of their induction or entry to the school/setting.
- Complete a written safeguarding concern when making a referral. Staff must be clear that this should be done immediately, always on the same day as stated within this policy.
- Be alert to the signs of harm and different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, and parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- Know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Understand that safeguarding issues often overlap and can put children at risk of harm, including:
    - Drug taking and/or alcohol misuse
    - Unexplained and/or persistent absences from education

    - Serious violence, criminal exploitation (including that linked to county lines), radicalisation

- Consensual and non-consensual making or sharing of nudes or semi-nudes.
- Be aware of new and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe.
- Understand the fact that children can be at risk of harm inside and outside of their home, at school and online.
- Understand that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation, or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Know that children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying.
- Know the potential vulnerabilities of children who are questioning their gender.
- Know that a child and their family may be experiencing multiple needs at the same time.
- Understand what to look for to identify children who need help or protection.

School/Setting Staff

All school/setting staff are responsible for:

- Reinforcing the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online).
- Understanding the school's/setting's unauthorised absence procedures and children missing education procedures.
- Understanding the early help/family help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- Knowing the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- Providing support to social workers or other agencies supporting children in addition to working with the school/setting Designated Safeguarding Lead (DSL)or Deputy Designated Safeguarding Leads (DDSL).
- Knowing the school's/setting's procedures for dealing with children who are persistently absent from education, particularly on repeat occasions, and reporting any such concerns to the designated lead.

- Listening to, and seeking out, the views, wishes and feelings of children.
- Sharing information and working together to provide children with the help they need.
- Referring any low-level concerns about another member of staff immediately to the headteacher/head of setting (or DSL/senior member of staff in their absence) no matter how small the concern may be.
- Referring any low-level concerns about the headteacher/head of setting immediately to the school/setting's Hub Director.
- Raising concerns about poor or unsafe practice and potential failures in the school/setting's safeguarding regime through the Whistleblowing Policy.

Headteacher/Head of Setting

The headteacher/head of setting is responsible for the implementation of this policy including:

- Appointing a DSL who is a member of the Senior Leadership Team (SLT).
- Ensuring that all staff (teaching/non-teaching, temporary/supply/visiting staff, plus volunteers including advocates and trustees) are:
    - Informed of all updates to safeguarding processes and procedures through training and reading at least Part 1 of Keeping Children Safe in Education (KCSIE)
    - Informed of the school/setting systems that support safeguarding, including this policy, as part of their induction/entry to the school/setting, with access to relevant training throughout the academic year
    - Understand and follow the procedures included in this policy, particularly those concerning referrals and cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school/setting and via the school/setting website.
- Ensuring that the DSL has appropriate status and authority to carry out their job, including additional time, funding, training and resources.
- Ensuring there is always adequate cover if the DSL is absent or off-site.
- Making decisions regarding all low-level concerns (though they may wish to collaborate with the DSL).
- Manage the process of any allegations of abuse made against another member of staff or volunteers, where appropriate in line with The Rivers C.of E. Academy Trust's Whistleblowing Policy.
- Carrying out basic enquiries to establish facts before contacting the Local Authority Designated Officer (LADO) when there has been an allegation of abuse against a member of staff.
- Ensuring the relevant staffing ratios are met, where applicable.

- Ensuring there are adequate and relevant staffing ratios and qualifications within any Early Years provision.
- Ensuring that each child in the Early Years Foundation Stage is assigned a key person.
- Ensuring the safeguarding requirements outlined in the Early Years statutory framework are met.
- Overseeing the safe use of technology, including devices such as mobile phones, wearable smart technology and cameras within the school/setting.
- Complying with The Rivers C.of E. Academy Trust's Safer Recruitment Policy and maintaining an accurate and up to date Single Central Record.
- Appointing a Designated Teacher for children who are looked after or previously looked after.
- Seeking evidence that any external agencies using the premises for non-school activities have appropriate safeguarding and child protection policies and procedures in place, whether or not children who attend any of these activities are on the school's roll.

Designated Safeguarding Lead

The DSL is a member of the Leadership Team, taking lead responsibility for child protection and wider safeguarding in the school/setting. The DSL will have attended enhanced, accredited Safeguarding training.

The DSL's responsibilities include ensuring that all staff and volunteers, know who the designated member of staff is and that they are aware of their individual responsibility to be alert to the signs of abuse and to consider the context within which specific safeguarding issues occur.

Responsibilities also include online safety and filtering and monitoring processes on school devices and school networks to keep children safe online.

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

- If a member of staff has a concern outside of school hours, they are still able to report their concerns using the school's/setting's online safeguarding software.
- If a member of staff has a concern outside of term time, they can contact The Rivers C.of E Academy Trust central office where a member of the Executive Team will be on call.

In the absence of the DSL and DDSL(s), the most senior member of staff in the school/setting will assume responsibility for any child protection matters that arise under the supervision of the Hub Director or Trust Safeguarding Lead. Any deputies will be trained to the same standard as the DSL.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Discuss concerns as required with outside agencies. This may include:

  - A specific agency for single need (e.g. speech and language therapy services or CAMHS)
  - Early intervention multi-agency (e.g. early help/family help process)
- Multi Agency Safeguarding Hub (MASH) or existing social worker (e.g. for child protection/significant harm concerns).
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Help promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with leaders and staff (as appropriate) within the school/setting.
- Be trained as the school/setting Prevent Lead.

The DSL will also:

- Keep the headteacher/head of setting and DDSL(s) informed of any issues and liaise with Local Authority case managers and designated officers for child protection concerns as appropriate.
- Take lead responsibility for understanding the filtering and monitoring systems and processes in place within the school/setting.
- Ensure that staff have appropriate Prevent training and induction.
- Discuss the local response to sexual violence and sexual harassment with police and Local Authority Children's Social Care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Ensure that child protection files are kept up to date and, when children leave the school/setting, ensure their child protection file is transferred to the new school/setting within five school days.
- Actively participate in regular safeguarding supervision sessions, providing invaluable support within their practice and professional development.

The full responsibilities of the DSL and DDSL(s) are set out in their job description.

Governance

The Rivers C.of E. Academy Trust Board has overall responsibility for ensuring that there are sufficient measures in place to safeguard the children within each school/setting.

The Trust Board will:

- Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Enable appropriate staffing and funding arrangements, overseeing the school's/setting's work within financial constraints.
- Ensure all schools/settings follow The Rivers C.of E. Safer Recruitment Policy and processes including maintaining an accurate Single Central Record.
- Appoint a link trustee for safeguarding and child protection to take lead responsibility within The Rivers C.of E. Academy Trust.
- Delegate specific responsibilities to the trust executive, the Director of Inclusion and the trust's safeguarding team.
- Delegate specific responsibilities to the Advocates for each school/setting in accordance with The Rivers C.of E. Academy Trust's Scheme of Delegation.
- Monitor and review the whole-trust approach to safeguarding termly, through the Audit, Risk and Compliance Committee and the termly strategy reports from the Safeguarding Link Trustee and the Director of Inclusion.
- Approve the Rivers C.of E. Academy Trust's Safeguarding and Child Protection Policy annually, ensuring it complies with the law.
- Ensure all schools/settings within The Rivers C.of E. Academy Trust have a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils.
- Ensure all schools/settings within The Rivers C.of E. Academy Trust have appropriate cyber security systems in place.
- Ensure that the school/setting has appropriate filtering and monitoring systems in place, and review their effectiveness including:
    - Making sure that all schools/settings are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
    - Ensuring that reviews are carried out by the DSL who is responsible for filtering and monitoring. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations

- Reviewing the DfE's filtering and monitoring standards, and discussing with relevant staff and service providers what needs to be done to support the school/setting in meeting these standards.

Parents/Carers

We operate an open-door policy and encourage parents and carers to raise any concerns they may have about their own child or any child who may be at risk of harm. All concerns will be taken seriously and addressed promptly, sensitively, and in accordance with safeguarding procedures.

Where additional support is required to meet the needs of a child or young person and their family, we will normally seek parental consent before involving partner agencies. However, where obtaining consent could place a child or young person at increased risk of harm, or where there are safeguarding concerns that require immediate action, appropriate referrals will be made without consent in line with statutory safeguarding guidance.

Parents/carers play a vital role in safeguarding children by ensuring that children attend the school/setting regularly, arrive on time, and are collected promptly at the end of the school day. If a pupil is not collected as expected, the school/setting will implement appropriate safeguarding procedures to ensure the child remains safe and supervised by a member of staff until suitable collection arrangements are made. In exceptional cases, the school may seek advice and support from the relevant Local Authority Safeguarding Team to ensure the child's safe return home. This may include assistance from partner agencies or transportation by a trusted adult, other than the parent/carer.

We also expect parents/carers to keep the school informed of any changes to family circumstances, home address, or contact details, and wherever possible to provide more than one emergency contact number so that they can be contacted quickly if required.

Virtual School Heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example the DSL; Designated Teacher for looked after and previously looked after children; SENCO, social workers, mental health leads and others.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity. If the visitor is unknown to the school/setting, we will check their credentials and reason for visiting before allowing them to enter. Visitors should be ready to produce identification.

Visitors must use the school/setting's signing in system and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the Local Authority or Educational Psychology Service, will provide prior written confirmation that an appropriate level of DBS check has been carried out and the DBS number (if this is provided, we will not ask to see the DBS certificate).

All other visitors, will always be accompanied by a member of staff.

Confidentiality

The Rivers C.of E. Academy Trust's Data Protection Policy gives further detail about information sharing but the following principles apply:

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Where a referral to a local safeguarding partner is made without consent, the reason for not gaining consent should be recorded.
- The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of safeguarding and promoting the welfare of children. Where there is a safeguarding concern, information should be shared with relevant professionals where this is necessary and proportionate to protect a child from harm.
- Where staff need to share special category personal data for safeguarding purposes, the Data Protection Act 2018 provides a specific condition for the safeguarding of children and individuals at risk. This may allow information to be shared without consent where consent cannot be obtained, cannot reasonably be expected to be obtained or where seeking consent could place a child at risk. Any sharing of special category personal data must also meet the relevant requirements of the UK GDPR and the Data Protection Act 2018.
- The government's Information Sharing advice for safeguarding practitioners includes seven 'golden rules' for sharing information and will support any member of staff who has to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL.

Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help/family help for a child who:

- Has a disability or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan).
- Has a mental health need.
- Is a young carer.
- Is pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- Is bereaved.
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, care or home.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, accesses an alternative provision or a pupil referral unit.
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised into terrorism.
- Is exposed to emerging technology risks, including AI, deepfakes, online exploitation or harmful digital content.
- Has a parent or carer in custody or is affected by parental offending.
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol.
- Has returned home to their family from care.
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage.
- Is a privately fostered child.

Staff, volunteers and advocates must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

If a child is suffering, is likely to suffer harm, or in immediate danger

All concerns must be reported through the school/setting online safeguarding software.

If the concern is urgent, speak to the DSL as soon as possible in addition to recording the cause for concern in writing. Although anyone can make a referral to children's services, the DSL has had specific training in triaging concerns.

If you believe a child is in immediate danger (e.g. you see something outside of school hours), call the police on 999.

If a child makes a disclosure

If a child discloses a safeguarding issue to you, you should listen to them, take their allegation seriously, and reassure them that you will take action to keep them safe.

You should:

- Actively listen and believe them.
- Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you.
  Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on.
  Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL using The Rivers C.of E. Academy Trust's online safeguarding reporting software (CPOMS).

Alternatively, if appropriate, make a referral to Local Authority Children's Social Care and/or the police directly, and tell the DSL as soon as possible that you have done so. Local Authority referral information and contact details can be found in Appendix A.

Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready or know how to tell someone that they are being abused, exploited or neglected.

- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

Within all our Early Years provisions, we will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions (e.g. about the safety of medicines or food hygiene).

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

Female Genital Mutilation (FGM) is explained in Keeping Children Safe in Education as "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as female genital cutting, circumcision or initiation. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix D of this policy.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow the local safeguarding procedures. Staff should not examine pupils.

Mandatory FGM reporting duties for teachers

Teachers have a statutory duty to immediately, and personally, report to the police if they:

- Have been informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth,

This is a mandatory legal duty. Failure to comply may result in disciplinary action. Unless specifically advised not to do so, teachers should also inform the DSL who will consider whether a referral to Local Authority Children's Social Care is appropriate.

The mandatory reporting duty for teachers applies only where FGM is known to have been carried out. It does not apply in cases where a pupil is at risk of FGM, or FGM is suspected but is there is no evidence that it has taken place. Staff should not examine pupils.

Any other member of staff who discovers that an act of FGM appears to have been carried out must speak to the DSL and follow local safeguarding procedures.

Local Authority referral information and contact details can be found in Appendix A.

If you have concerns about a child's welfare which may indicate a safeguarding issue

Appendix E illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action.

Speak to a member of the Senior Leadership Team, a member of The Rivers C.of E. Academy Trust Safeguarding Team (detailed in this policy's key contacts list) and/or take advice from Local Authority Children's Social Care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. If appropriate, make a referral to Local Authority Children's Social Care directly. Share details of any actions you take with the DSL as soon as practically possible.

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment that are required. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review, and the school will consider a referral to Local Authority Children's Social Care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

The Local Authority should decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Local Authority referral information and contact details can be found in Appendix A.

If you have concerns about extremism or radicalisation

The Prevent Duty requires all schools/settings 'to help prevent the risk of people becoming terrorists or supporting terrorism'. This includes safeguarding learners from extremist ideologies and radicalisation. The school/setting DSL is also the Prevent Lead.

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team, a member of The Rivers C.of E. Academy Trust safeguarding team (detailed in this policy's key contacts list) and/or take advice from Local Authority Children's Social Care. Make a referral to Local Authority Children's Social Care directly, if appropriate. Local Authority referral information and contact details can be found in Appendix A. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the Local Authority Children's Social Care team.

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

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

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist related.

If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- 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.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action and speak to the DSL straight away.

Where it is believed that a child is in immediate danger, arrangements will be made for the child to be taken to A&E immediately by their parent/carer, other suitable person, or emergency services.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is not also a safeguarding concern, speak to your school's Senior Mental Health Lead or DSL to agree a course of action. This may include:

- Signposting to appropriate help and intervention.
- Referral to a Mental Health Support Team or CAMHS (where appropriate)

If you have concerns about a staff member, supply/agency worker, trainee, volunteer or contractor

If you have concerns about a member of staff (including supply/agency workers, trainees, volunteers and contractors), or an allegation is made about a member of staff (including supply/agency workers, trainees, volunteers and contractors) posing a risk of harm to children, speak to the headteacher as soon as possible.

If you are made aware of concerns about a member of staff or volunteer working with children in an out-of-school setting using the school premises, the school's normal safeguarding procedures should be followed including informing the LADO. For all settings with Early Years provision, the school will inform Ofsted (where appropriate) of the allegation and actions taken, within the necessary timescale.

If the concerns/allegations are about the headteacher, speak to the Hub Director.

If you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the headteacher, you are able to report to the Hub Director.

Further information about reporting concerns can be found in The Rivers C.of E. Academy Trust's Low Level Concerns Protocol, Allegations of Abuse Policy and the Whistleblowing Policy which provides additional avenues of reporting.

Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "part of growing up", or "boys being boys", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under the Behaviour Policy, but this Safeguarding and Child Protection Policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry.

See Appendix D for further information about child-on-child abuse.

If a pupil makes an allegation of abuse against another pupil:

- Staff must record the allegation and tell the DSL but not investigate it.
- The DSL will contact the Local Authority Children's Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images.

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse (ensuring staff reassure victims that they are being taken seriously).
- Remain alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our school environment.
- Remain alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

We will also ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, religion, ethnicity and/or sexual orientation

- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or Local Authority Children's Social Care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

This section summarises child-on-child abuse. Further information can be found within Appendix D.

Making or sharing of nudes and semi-nudes

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response.

If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to police and/or Local Authority Children's Social Care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.
- The imagery involves sexual acts and any pupil in the images or videos is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or Local

Authority Children's Social Care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL
If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to Local Authority Children's Social Care and/or the police immediately.

Informing parents/carers
The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police If it is necessary to refer an incident to the police, this will be done through existing arrangements, e.g. a safer schools' officer, a police community support officer, local neighbourhood police, dialling 101.

Recording incidents
All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded.

Curriculum coverage
Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to make, provide (or forward) such images.
- The receipt of such images.

This policy on the making or sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first.
- Approaching from the perspective of the child.
- Promoting dialogue and understanding.
- Empowering and enabling children and young people.
- Never frightening or scare-mongering.
- Challenging victim-blaming attitudes.

This is an approach based on guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology for all staff and for DSLs and senior leaders.

Reporting systems for children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
To achieve this, we will:

- Put systems in place for pupils to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Share information with pupils about reporting systems and processes available to them e.g. through discussion in your relationships/sex education curriculum and through regular reminders both visually and verbally.

Children Absent or Missing from Education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

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

All settings within The Rivers C.of E. Academy Trust follow the Inclusive Attendance approach, recognising the critical importance of regular school attendance for both educational success and safeguarding.

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

Within all settings with Early Years provision, if a child is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents/carers and alternative emergency contacts.

We will also:

- Consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.
- Consider the child's vulnerability, parent/carer's vulnerability and their home life. Any concerns will be referred to Local Authority Children's Social Care and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the Local Authority Children's Social Care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Local Authority referral information and contact details can be found in Appendix A.

Online Safety and the Use of Mobile Technology

All schools/settings at The Rivers C.of E. Academy Trust recognise the importance of online safety as we operate within an increasingly digital world. This includes safeguarding children from potential harmful and inappropriate online material.

To address this, our school/setting aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and advocates.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile phones and smart technology.
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that schools/settings are a mobile phone-free environment by default.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying.
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The use of mobile phones and smart technology

The use of mobile phones, cameras, and other electronic devices with imaging and sharing capabilities is carefully regulated to ensure the safeguarding of all individuals involved.

- Pupils with mobile phones, smart watches or other electronic devices with imaging and sharing capabilities will hand these into staff upon arrival at school.

- Pupil devices will be inaccessible to pupils throughout the school day (securely locked away).
- Devices will be returned to pupils when they leave school.

To uphold safeguarding requirements and compliance, The Rivers C.of E. Academy Trust have established clear guidelines regarding the use of personal devices within the setting for staff as identified within the Staff Code of Conduct and the Acceptable Use Policy.

All staff and volunteers will be aware that:

- Personal devices are able to be brought to school for personal use, but staff and volunteers will limit such use to non-contact time when pupils are not present.
- Staff will not take pictures or recordings of pupils on their personal devices.
- Staff in Early Years settings should have smartwatches / wearable technology set to aeroplane mode and/or disable Bluetooth to reduce the risk of distraction and the possibility of inappropriate content being accessed or displayed.

At all times, staff will be vigilant in monitoring the use of such devices to prevent inappropriate capturing or sharing of images or information.

Leaders will ensure that visiting parents and carers are aware that they must seek explicit consent before taking photographs or videos, especially where children or vulnerable individuals are involved.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

The Rivers C.of E. Academy Trust recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE).

Risk reduction

To meet our aims and address the online risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private

  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety including information shared via our website, communications sent directly to them and/or information shared during parents' evenings.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

This section summarises our approach to online safety and mobile phone use. Full details can be found within our Staff Code of Conduct and the Acceptable Use Policy.

Notifying Parents or Carers

Where appropriate, schools/settings will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure.

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

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the Local Authority Children's Social Care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child/children involved, and when. We will work with the police and/or Local Authority Children's Social Care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis) will:

- Meet with the victim's parents/carers and with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.

- Meet with the alleged perpetrator's parents/carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s).

Early years Setting within our School

All staff working within the Early Years Foundation Stage will read and comply with the EYFS Statutory Framework and the safeguarding and welfare requirements relevant to their role, within this framework and alongside Keeping Children Safe in Education 2026.

Pupils with Special Educational Needs, Disabilities or Health Issues

We recognise that pupils with Special Educational Needs (SEN), disabilities or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.

The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse.

The need for intimate care or that these children are isolated from others.

That these children are more likely to be dependent on adults for care.

Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school/setting or being unable to understand the consequences of doing so.

Schools/settings can offer a variety of additional pastoral support for pupils and will help pupils to overcome any communication barriers they face.

Any abuse involving pupils with SEND will require close liaison with the DSL and the Special Educational Needs Coordinator (SENCO).

Pupils with Medical Conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition.

For example, information about the child's medical condition might be withheld from the school/setting, or the child may be repeatedly sent to the school/setting without essential medication, putting them at risk.

Young Carers

All schools/settings within The Rivers C.of E. Academy Trust recognise that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing.

Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that Adverse Childhood Experiences (ACES) and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.

Looked After and Previously Looked After Children

The Rivers C.of E. Academy Trust will ensure that staff have the skills, knowledge and understanding to keep looked after children and previously looked after children safe. We will ensure that:

- A Designated Teacher for looked after and previously looked after children is appointed who is appropriately trained and has the relevant qualifications/experience to perform the role.
- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

As part of their role, the Designated Teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

Pupils who are Lesbian Gay or Bisexual

The Rivers C.of E. Academy Trust recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying.

Any concerns should be reported to the DSL.

Pupils who are Questioning Their Gender

The Rivers C.of E. Academy Trust are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. The school/setting will ensure that children and their families are aware that, while the school/setting will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will consider the principle of taking a careful approach. Further information around our approach to pupils who are questioning their gender can be found within Appendix F.

Complaints and Concerns

Complaints against staff (including supply/agency workers, trainees, volunteers and contractors) that may require a child protection investigation will be handled in accordance with the Allegations of Abuse Policy.

Other complaints will follow the appropriate process within The Rivers C.of E. Academy Trust's Complaints Policy.

Early years providers in our Trust will take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage.

The Rivers C.of E. Academy Trust's Whistleblowing Policy covers how staff report concerns regarding the way the school/setting safeguards pupils, including poor or unsafe practice, or protentional failures.

Record Keeping

Safeguarding records will be held in line with our data retention schedule.

All safeguarding concerns, discussions, decisions made (including the rationale for those decisions) will be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

If a child for whom the school/setting has, or has had, safeguarding concerns moves to another school/setting, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/setting to have support in place when the child arrives, this will be:

- Within **5 days** for an in-year transfer, or within
- Within **the first 5 days** of the start of a new term

A signed receipt will be required from the receiving establishment.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving establishment and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

If the child does not attend another school/setting, the safeguarding file will be retained until their 26th birthday.

Training

All staff members will undertake safeguarding and child protection training at induction, including whistleblowing procedures and online safety, to ensure they understand the school/setting's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.

- Have regard to the Teachers' Standards to support the expectation that all teachers:
- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including online safety, as required but at least annually (for example, through bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training if applicable.

Links with Other Policies

This policy links to the following policies and procedures

- Acceptable Use Policy
- Allegations of Abuse Policy
- Allergy Policy
- Attendance Policy
- Behaviour Policy
- Children with Health Needs who Cannot Attend School Policy
- Complaints Policy
- Data Protection Policy
- First Aid and Administration of Medicine Principles and Procedures
- Health and Safety Policy
- Intimate Care Policy
- Low Level Concerns Protocol
- Restrictive Intervention Policy
- Safer Recruitment Policy
- SEND Policy
- Staff Code of Conduct
- Supporting Children with Medical Conditions Policy
- Whistleblowing Policy

Appendix A – Local Authority and External Agency Contacts

Area/Organisation	Contact/Details
Dudley Multi Agency Safeguarding Hub (MASH) and other services	**Dudley Safeguarding People Partnership** - dudleysafeguarding.org.uk **Children's Front Door** Telephone - 0300 5555 0050 (out of hours 0300 5555 8574) Online Portal - Dudley Children's Portal **Lead for Safeguarding in Education** Jane Dickens Email – Jane.dickens@dudley.gov.uk **LADO** Telephone – 01384 813061 Email - allegations@dudley.gov.uk **Prevent** Website PREVENT | Dudley Safe & Sound **Exploitation** Email – CS.Hub@dudley.gov.uk **Virtual School** Headteacher – Emma Thomas Telephone – 01384 815208
Sandwell Multi Agency Safeguarding Hub (MASH) and other services	**Sandwell Children's Safeguarding Partnership - Home - Sandwell CSP** **MASH** Telephone – 0121 569 3100 Email – access_team@sandwellchildrenstrust.org Online Portal – Report a Concern - Sandwell CSP **MASH Education Officer** Lisa Harvey Email – lisa_harvey@sandwell.gov.uk **LADO** Telephone – 0121 569 4770 Email – sandwell_lado@sandwellchildrenstrust.org **Prevent** Email – Prevent_Inbox@sandwell.gov.uk **Harm Outside The Home Team** Email – CE_team@sandwellchildrenstrust.org Phone – 0121 5692524 or 0121 5698391

	Virtual School Headteacher – Kathy Ross Telephone – 0121 569 2770 Email – LACE_Team@sandwell.gov.uk
Worcestershire Multi Agency Safeguarding Hub (MASH) and other services	**Worcestershire Children's Safeguarding Partnership** – About - Worcestershire Safeguarding Boards **Family Front Door** Telephone – 01905 822666 Online Portal - Login **Lead for Safeguarding in Education** Denise Hannibal Email – dhannibal@worcestershire.gov.uk **LADO** Telephone – 01905 846221 Email – LADO@worcestershire.gov.uk **Prevent** Jim Bayliss Telephone – 01905 822666 **GET SAFE** Email – getsafe@worcestershire.gov.uk **Virtual School** Headteacher – Matthew Stiles Telephone – 07955 311419 Email – mstiles@worcestershire.gov.uk
Emergency contacts for outside of school hours	**Police** - call 999 if a crime is taking place or someone is in immediate danger including FGM concerns **Police** - call 101 for non-urgent Police matters that do not require an immediate response. **NSPCC Helpline**: 0808 800 5000 **ChildLine:** 0800 1111
Additional Contacts	**Counter Terrorism Helpline** – 020 7340 7264 **Counter Terrorism Email** – counter.extremism@education.gov **Online Safety Guidance** – CEOP Education **CEOP Safety Centre** – CEOP Safety Centre

Appendix B – Legislation

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

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to have completed safer recruitment training.
- Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children.
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR).
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our advocates and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- The Public Sector Equality Duty (PSED), 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 pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.
- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse.
- 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.
- This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

Appendix C – Types of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- Verbal abuse such as criticism, belittling, or name-calling.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

Physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

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

Appendix D – Specific Safeguarding Issues Further Information

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority Children's Social Care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.
In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend.
- Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority Children's Social Care team and the police, if appropriate.

Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Physical assault and harm, or the threat of harm with a weapon.
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI.
- 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 to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the reporting procedures set out in this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern

Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL [and deputy/deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to Local Authority Children's Social Care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

FGM appears to have been carried out or suspects that a pupil is at risk of FGM.
Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/pupil already being known to social services in relation to other safeguarding issues.
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable

- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs.

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

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

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people;
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent Lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.
Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and the NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.

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

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

If staff are concerned about a pupil, they will follow our reporting procedures, including discussing their concerns with the DSL.

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

Harmful sexual behaviour/sexual violence/sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is

sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face-to-face (both physically and verbally).

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse.

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the reporting procedures set out in this policy, as appropriate.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault.
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying).
- Criminal exploitation.

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child has been. approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school.
- Having been involved in offending, such as theft or robbery.
- Being male.
- Having experienced child maltreatment.
- Having used drugs or alcohol in early adolescence.
- Having previously been a victim or previously perpetrated violence.

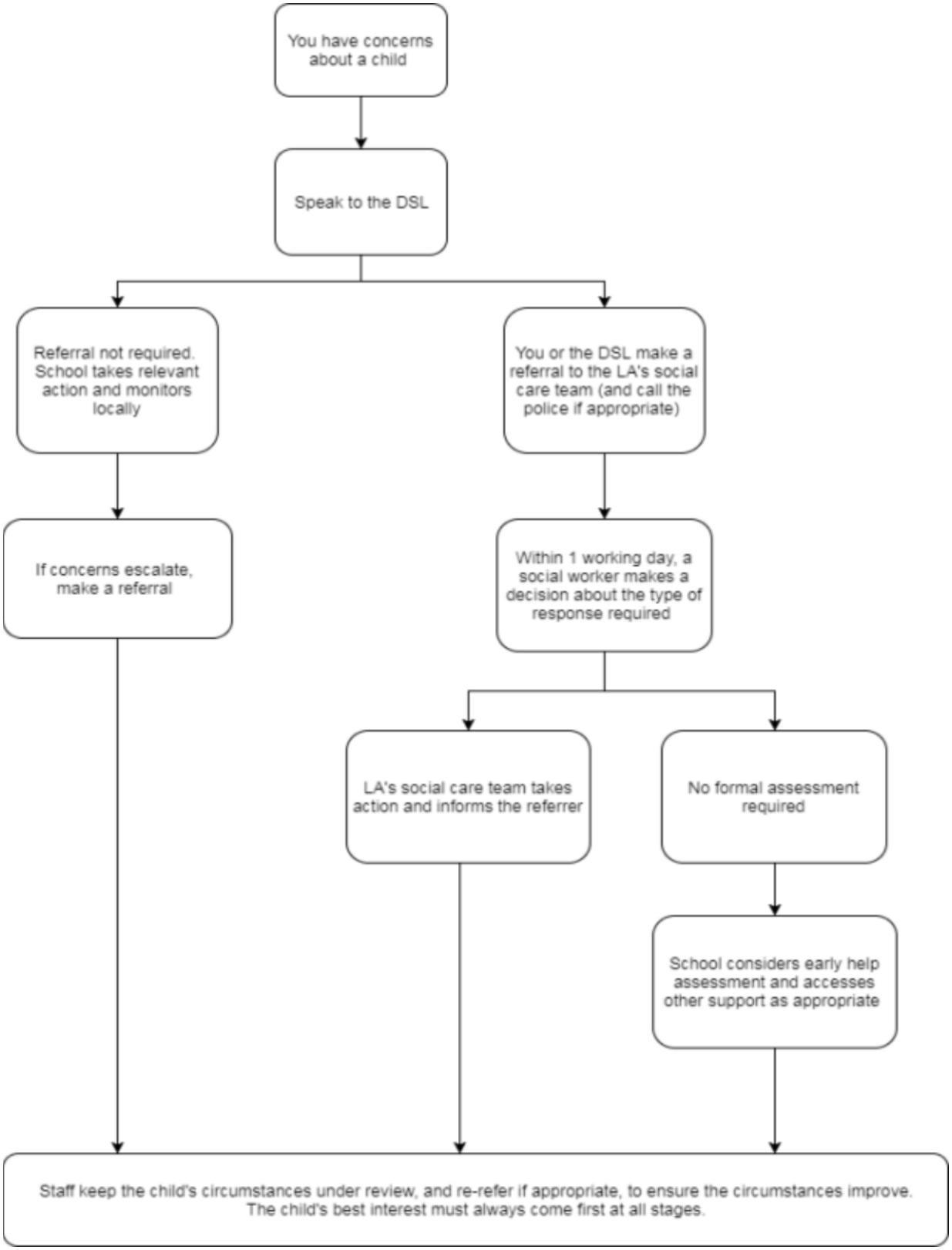
Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).
If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action.
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict.

Appendix E – Welfare Flowchart

Figure 1 - procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



Appendix F – Supporting Children who are Gender Questioning

This document constitutes the operational approach of The Rivers C.of E. Academy Trust and all member academies. It has been approved by the Executive Team and all staff are expected to comply with it. It reflects the Trust's statutory obligations under the legal framework set out below. It has been reviewed and updated following finalisation of the 2026 edition of Keeping Children Safe in Education

Purpose

This appendix sets out our safeguarding approach to supporting primary-aged pupils who may be questioning their gender. It includes operational arrangements for implementing the statutory safeguarding expectations contained within KCSIE (2026).

The Rivers C.of E. Academy Trust recognises that matters relating to children who may be questioning their gender can be deeply personal for children and their families. Whilst this approach is intentionally written in a measured and legally focused manner, this should not be mistaken for a lack of compassion or care. Its purpose is to provide clear and consistent guidance to schools/settings, while ensuring that every child and family is treated with dignity, kindness and respect.

Guiding Safeguarding Principles

Where any accommodation relating to social transition is under consideration, the safeguarding and welfare of all other pupils must be assessed as a distinct and potentially determinative factor.

- The trust adopts a safeguarding-led presumption against supporting social transition in primary-aged children. In line with KCSIE (2026), the trust's default position is that requests to support social transition will not normally be agreed.
- There is no presumption that any request relating to social transition will be agreed.
- Decisions will be made individually, having regard to the child's welfare, the safety, privacy and rights of other pupils, statutory safeguarding duties and all relevant legal obligations.
- Primary-aged children are still developing; expressions of identity may change.
- Schools must operate within the law, including duties relating to sex-based privacy and safety.
- **Schools must take a safeguarding-led and evidence-informed approach to any request relating to social transition.**
- Decisions must be proportionate, evidence-informed and recorded.
- All pupils must be treated with dignity and protected from bullying.

Approach to Social Transition

For the purposes of this guidance, social transition may include changes to name, pronouns, dress, presentation, participation or access to facilities associated with the opposite sex.

The school/setting must record each pupil's legal name and biological sex within the admissions register. All relevant staff must be made aware of a gender-questioning pupil's biological sex to enable the school to fulfil its safeguarding duties.

The DSL will be informed of all requests to support social transitioning and will determine what action is needed to safeguard the child.

Professional curiosity should begin from the premise that a child who is questioning their gender may be experiencing a range of developmental, psychological, social or safeguarding influences. Leaders must therefore satisfy themselves that these have been carefully explored and considered before any request relating to social transition is determined. Decisions should not be made solely on the wishes of the parent and/or child.

Nothing in this policy prevents schools/settings from providing appropriate pastoral support, reassurance or emotional support to a child. This Policy applies where requests are made for social transition or other changes requiring formal safeguarding consideration.

In line with Department for Education guidance:

- A precautionary, safeguarding-led approach is adopted.
- Schools/settings will not initiate, facilitate or actively promote social transition.
- Schools are under no general legal duty to accommodate social transition.
- Parental requests regarding social transition will not be automatically agreed
- No pupil will be encouraged by staff to question or change their gender identity.

Support will focus on pastoral care, emotional wellbeing and access to education, rather than affirmation of a particular identity.

Parental Involvement

Parents/carers will usually be informed and involved at the earliest appropriate stage whenever a pupil raises a gender-related concern or makes any request relating to social transition. The Rivers C.of E. Trust regards parental engagement as a matter of priority, not an optional step.

- Schools/settings will actively encourage the pupil to speak to their parents/carers.
- Parent/carer consent will be required in the vast majority of cases before any accommodation relating to social transition is agreed. Views of parents/carers must be duly considered in any decision-making process.

- The school/setting may ask parents/carers to obtain clinical advice on the risks and benefits of social transition as a planned intervention for their child, to ensure appropriate support is provided that is in line with the child's best interests.
- Schools/settings will inform parents or carers about a child's request to socially transition unless there is credible evidence that informing parents or carers would place the child at risk of significant harm.
- Such situations will be managed under formal safeguarding procedures.

Confidentiality and information sharing
Staff must not promise confidentiality where safeguarding duties apply. This includes situations where a pupil discloses that they may be questioning their gender, even where no change is requested. In such cases, staff may listen respectfully to the pupil's feelings without automatically informing parents/carers but must make clear that they cannot keep what is shared confidential if safeguarding concerns arise.

Where a disclosure gives rise to safeguarding concerns, the DSL must be informed promptly in accordance with this policy. Information about a gender-questioning pupil will be shared with staff on a strict need-to-know basis, in accordance with UK GDPR, the Data Protection Act 2018, and our Data Protection Policy. Staff receiving such information must not share it further without authorisation from the DSL or headteacher/head of setting.

Engagement with external agencies
The school/setting may seek external clinical advice to support a neutral (neither affirmation-based nor aversion-based) approach:

- All external referrals will be to appropriately regulated professionals.
- Any clinical advice received will be one factor in the school's decision-making, not determinative.
- The headteacher/head of setting retains decision-making authority in relation to school-based arrangements.

Living in stealth
Where other pupils or staff are unaware of a child's biological sex (living in stealth), schools/settings should carefully consider whether this creates additional safeguarding, welfare or practical risks. Any such circumstances should form part of the safeguarding assessment and be reviewed regularly.

Living in stealth should not prevent relevant information about a child's biological sex being shared on a strictly need-to-know basis where this is necessary to:

- Safeguard the child or others.
- Respond to an emergency medical situation where biological sex is clinically relevant.
- Enable appropriate safeguarding assessment or investigation.

- Protect the sex-based privacy, dignity or safety of other pupils.

Staff must not promise absolute confidentiality and should share information only in accordance with the school's safeguarding procedures, data protection obligations and the principle of minimum necessary disclosure.

Single-Sex Spaces and Facilities
All schools/settings will comply fully with statutory requirements for sex-separated facilities under the School Premises Regulations:

- Separate toilets for boys and girls are required from age 8
- Suitable changing facilities must be provided from age 11
- Pupils will normally use facilities designated for their biological sex.
- Pupils will not use toilets, changing rooms or residential accommodation designated for the opposite biological sex.
- Where additional support is required, this will normally be through suitable alternative arrangements, such as individual facilities, rather than access to opposite-sex communal facilities.

Residential Visits and Overnight Provision
Residential activities present heightened safeguarding responsibilities. Sleeping arrangements (including dormitories, shared rooms, tents or cabins) will be organised strictly on a single-sex basis according to biological sex.

Where appropriate and practicable, alternative individual arrangements may be considered following:

- A robust written risk assessment
- Parental agreement
- Consideration of privacy, dignity and safety

Under no circumstances will pupils of different sexes be required or permitted to share sleeping accommodation. Schools should explain these arrangements sensitively to pupils and parents whilst making clear that safeguarding, privacy and dignity for all pupils remain paramount

Uniform, Physical Education and Activities
Pupils will normally follow uniform expectations associated with their biological sex.

Limited flexibility may be considered where lawful, practical and in the child's best interests - provided this does not:

- Undermine safeguarding.
- Cause disruption.
- Compromise safety or fairness.
- Create unreasonable burdens on staff or pupils.

Participation in sport and physical activity will prioritise safety and fairness for all.

Names and Pronouns

Schools must record each pupil's legal name in the admissions register. Schools may allow pupils to be known informally by a different name if, having fully consulted with the child's parents/carers, the headteacher/head of setting considers it is in the child's best interests to do so. Any such informal name change does not alter the admissions register entry.

Schools must not encourage or promote pupils changing gender and should take a precautionary approach, equally, no member of staff will be required to use preferred pronouns. The use of a pupil's first name is available as an alternative form of address in all circumstances.

Risk Assessment and Decision-Making

Each case will be considered individually against the following factors:

- The child's wellbeing and expressed wishes (noting that the child's wishes may not be the same as their best interests).
- Age and developmental stage (requests from younger children must be treated with greater caution).
- The duration and consistency of the request – whether the child has made similar requests previously and whether the request appears to be sustained.
- Whether the child may have been influenced by peers, social media, or other external factors.
- Whether the child may feel pressure to identify differently because they do not conform to sex-based stereotypes.
- Whether there is any interaction with the child's sexual orientation – where this is relevant, staff must make clear to the child that they are under no pressure to reach any particular outcome.
- Any relevant clinical or medical information available (noting that disclosure is not obligatory, but where available it should be considered).
- The advice and input of the SENCO where there is any suggestion of a connection to a learning or developmental need.
- Impact on the requesting child (short, and long-term, taking account of the Cass Review's finding that social transition may have significant psychological effects).
- Privacy and dignity of all pupils.
- Legal duties.
- Practical implications.
- Views of parents/carers.
- Decisions will be made by the headteacher/head of setting with advice from the DSL.
- External professional that has been sought where appropriate.

Leaders should remain professionally curious and consider whether there are any wider safeguarding issues affecting the child, including mental health, neurodevelopmental conditions, peer relationships, bullying, family circumstances or external influences.

Recording and Review
All decisions, actions and rationales will be documented.
Arrangements will be reviewed regularly to ensure they remain appropriate and lawful.

Staff Conduct Expectations
Staff must act in accordance with safeguarding duties and professional standards.

Staff must not:

- Encourage concealment from parents (unless safeguarding procedures apply).
- Promote a particular view of gender identity.
- Make unilateral decisions outside school processes.
- Depart from this guidance without senior approval.

Concerns must be referred to the DSL.

Where any change has been formally agreed under this policy, the headteacher/head of setting or the DSL will communicate this to all relevant staff in a clear, consistent, and proportionate manner.

Such communication will not imply that contested views around gender identity are fact and will not disclose unnecessary personal information about the pupil. Other pupils, parents, and staff may hold protected religious or other beliefs that differ from the decision taken; these are legitimate views that must be respected.

Operational Guidance

Headteacher/Head of Setting Decision-Making Checklist
Before agreeing to any request, leaders should confirm:

- Has a safeguarding assessment been completed?
- Have parents been informed and involved (unless risk of harm)?
- Are legal duties regarding single-sex provision being met?
- What is the impact on other pupils?
- Are arrangements proportionate and practical?
- Is documentation complete?
- Has Trust advice been sought where necessary?
- Is a review date set?

Staff Quick-Response Protocol
If a pupil raises gender-related concerns staff should:

- Listen calmly and respectfully, remaining professionally curious and avoid reaching immediate conclusions.
- Avoid making promises or agreeing to requests.
- Reassure the pupil they will be supported.
- Explain that information may need to be shared to keep them safe.
- Record the conversation factually.
- Inform the Designated Safeguarding Lead promptly.

Staff should not:

- Offer to keep secrets from parents.
- Suggest social transition steps.
- Change names/pronouns without approval.
- Seek to resolve the matter independently.

Ofsted and Accountability Considerations

This guidance supports inspection expectations by demonstrating that the trust:

- Prioritises safeguarding.
- Manages sensitive issues lawfully.
- Protects all pupils from harm.
- Maintains clear procedures.
- Ensures staff understand their responsibilities.
- Records and reviews decisions.

Complaints and Legal Challenge Preparedness

Decisions made under this guidance will be:

- Evidence-based
- Individually assessed
- Properly recorded
- Consistent with statutory duties
- Complaints will be managed under the trust complaints procedure.