



Safeguarding and Child Protection Policy

Oak Trees Multi Academy Trust

September 2025

Trust policy lead	Lisa Finnegan lfinnegan@oaktreesmat.co.uk
Trust Safeguarding Lead	Lisa Finnegan lfinnegan@oaktreesmat.co.uk
Safeguarding Trustee	Jane Owens chair@oaktreesmat.co.uk
Last Updated	September 2025
Approved by the Trust Board	September 2025
Date to Review	September 2026 (at the latest)

Oak Trees Multi Academy Trust - Statement of intent

Oak Trees MAT is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of our schools' premises. We implement a Trust-wide preventative approach to safeguarding, ensuring that the wellbeing of pupils is at the forefront of all action taken.

Where schools have pupils attending a sixth form provision who are over the age of 18, the Trust acknowledges that adult safeguarding procedures apply and will act in the best interest of the pupil, in line with their wishes and along with local safeguarding adult procedures.

Where settings have an EYFS provision for children who are under the age of 5, the Trust follows the safeguarding requirements in the [EYFS Framework for group and school providers](#) for staff and Designated Safeguarding Leads, including the criteria for safeguarding training set out in Annex C of the framework.

The Trust does not tolerate any form of bullying, including sexual harassment and violence.

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

- All members of staff.
- Any volunteers or trainee members of staff.
- All schools within the Trust.
- All Governors and Trustees and Members.
- The Trust as a whole, including Executive and Central staff.
- Any associate members of the board of Trustees and/or its committees.

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

- Ensuring that Trustees, Governing Bodies, Central Team staff, Headteachers and all staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to an appropriately trained person, e.g. the Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) within their school and to escalate concerns in the best interest of children, if needed.
- Ensuring pupils are taught how to keep safe and recognise behaviour that is unacceptable and feel confident in knowing how to report concerns, where able.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, exploitation and radicalisation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that Headteachers and any new staff and volunteers within the Trust are only appointed when all the appropriate checks have been satisfactorily completed.

Trust and School Safeguarding and Child Protection Policy

Should you wish to raise a complaint in regards to safeguarding practice of any Oak Trees Multi Academy Trust School or member of staff, please do so by contacting complaints@oaktreesmat.co.uk

Oak Trees Multi Academy Trust ensures that safeguarding is prioritised through the strategic oversight of the Trust Safeguarding Lead and Team, providing ongoing regular input into all aspects of safeguarding, strengthening practice in schools across the Trust to maintain safe environments where children can learn and thrive.

The Trust Designated Safeguarding Lead is: Lisa Finnegan

Email: lfinnegan@oaktreesmat.co.uk

Trust and School Safeguarding and Child Protection Policy

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- **Key contacts and training details Oak Trees MAT**

Trust contacts and training details		
Role	Name	Details of training
Trust Safeguarding Lead Trust Prevent Lead Trust Operation Encompass Lead	Lisa Finnegan	DSL Training – March 2024
Safeguarding Trustee	Jane Owens	Safeguarding and Prevent Training – February 2025

Key contact details Wirral Local Authority

Role:	Name / Details:	Contact:
Local Authority Designated Officer (LADO)	Kevin Dykes	safeguardingunit@wirral.gov.uk kerrywilliams@wirral.gov.uk
Head of Service Quality & Safeguarding Children	Lynn Campbell	0151 666 4442
Delegated Safeguarding Partner for Education	Nicola Griffiths	nicolagriffiths2@wirral.gov.uk
Prevent Single Point of Contact	Andrea Bignall	Andrea.Mears@merseyside.police.uk 0151 777 8506
Director of Children's Services	Elizabeth Hartley Elizabeth Hartley	0151 606 2000
Integrated Front Door	Mon-Fri, 9am – 5pm Outside of these hours	Tel: 0151 606 2008 ifd@wirral.gov.uk Tel: 0151 677 6557

Trust and School Safeguarding and Child Protection Policy

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Brackenwood Junior School contacts and training details		
Role	Name	Details of training
Designated Safeguarding Leads	Sarah Lees- Headteacher Clare Balmer – Assistant Headteacher Rona McKinney- Senior Leadership	Jun 2025 November 2024 Oct 2025
Prevent Lead	Sarah Lees Clare Balmer	Sept 2025 Sept 2025
Operation Encompass Lead	Sarah Lees Clare Balmer	Sept 2025 Sept 2025
Safeguarding Governor	David Stanley	Sept 2025

Trust Context and rationale:

Oak Trees Multi Academy Trust is a growing cross phase Multi-Academy Trust in the Wirral area, serving young people from the age of nine months to nineteen years. We recognise our duty to serve our Wirral community and have a full awareness of the local priorities as outlined in <https://www.wirralsafeguarding.co.uk/annual-report-2023-business-plan-24-26/>.

Oak Trees MAT recognises the benefit of Early Help and providing support for children and families as soon as a problem emerges at any stage in a child's life. We offer this support in line with local safeguarding arrangements. Our single agency response includes support through our pastoral structures and trained Designated Safeguarding Leads. Where more complex needs arise the process for joint agency support will be followed through referral to the Local Authority Early Help Service as well as other relevant local and national agencies providing support. [Early Help and Support for Families - Wirral Safeguarding Children Partnership](#)

Where there is reasonable cause to suspect a child is at risk of or has experienced significant harm, the school will follow the procedures set out by the Wirral Safeguarding Children Partnership or for the geographical location where the child resides and their statutory guidance.

Wirral Safeguarding Partnership - [Concerned about a child - Wirral Safeguarding Children Partnership](#)

Trust and School Safeguarding and Child Protection Policy

Oak Trees MAT ensures that all staff and volunteers receive annual training on safeguarding as well as regular updates as part of an annual plan for the ongoing development of staff expertise around specific safeguarding issues. Our Trustees and Local Governing Committees receive specific governance safeguarding training at point of induction which is updated regularly.

Children are taught about safeguarding through the PSHE curriculum regularly as part of our responsibility to equip them with skills to recognise abuse, remain safe online and know how to report their concerns. We recognise this is vitally important in our preventative approach to keeping all children in all our schools safe.

Trust and School Safeguarding and Child Protection Policy

School Context and rationale:

Brackenwood Junior School is an average junior primary school based in the Bebington area of Wirral. Whereas we recognise that any safeguarding issue can occur in a child's life, there are some safeguarding concerns that are more prevalent than others within our setting. These are: domestic abuse and violence, neglect and online safety.

Brackenwood Junior School recognises that experiencing these issues can mean children could be more vulnerable to experiencing abuse and neglect and contextual risks such as child exploitation. Brackenwood Junior School recognises the benefit of Early Help and providing support for children and families as soon as a problem emerges at any stage in a child's life. We offer this support in line Wirral multi – agency thresholds [Multi-agency Thresholds - Wirral Safeguarding Children Partnership](#). Our single agency response includes support through our pastoral structures and trained Designated Safeguarding Leads. Where more complex needs arise the process for joint agency support will be followed through referrals following the multi – agency threshold guidance, as well as other relevant local and national agencies providing support. Where there is reasonable cause to suspect a child is at risk of or has experienced significant harm, the school will follow the procedures set out by Wirral Safeguarding Children Partnership arrangements and statutory guidance. [Children and Young People - Wirral Safeguarding Children Partnership](#)

Brackenwood Junior School ensures that all staff and volunteers receive annual training on safeguarding as well as regular updates as part of an annual plan for the ongoing development of staff expertise around specific safeguarding issues. Children are taught about safeguarding through the PSHE curriculum regularly as part of our responsibility to equip them with skills to recognise abuse, remain safe online and know how to report their concerns. We recognise this is vitally important in our preventative approach to keeping all children in school safe.

Trust and School Safeguarding and Child Protection Policy

- **Definitions**

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

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the 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.

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

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

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

For the purposes of this policy, **“sexual harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to

Trust and School Safeguarding and Child Protection Policy

violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

The consensual and non-consensual sharing of nude and semi-nude images and/or videos.

Sharing unwanted explicit content.

Upskirting.

Sexualised online bullying.

Unwanted sexual comments and messages, including on social media.

Sexual exploitation, coercion, and threats.

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

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

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

1. Legal framework

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

Legislation

Trust and School Safeguarding and Child Protection Policy

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Victim and Prisoners Act 2024
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2025) 'Keeping children safe in education'
- DfE (2023) 'Working Together to Safeguard Children'
- Home Office (2022) 'Domestic Abuse guidance'
- DfE (2023) 'The Prevent Duty Guidance'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2024) 'Academy Trust Handbook 2024'
- DfE (2025) 'Use of Reasonable Force and Other Restrictive Measures'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Academy Trust governance'

Trust and School Safeguarding and Child Protection Policy

- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Behaviour in schools'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- NPCC 'When to Call the Police'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'

Policies and documents

This policy operates in conjunction with the following school-level and Trust-wide policies:

- Anti-bullying Policy
- Data Protection Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Behaviour Policy
- Complaints Policy

2. Roles and responsibilities

The Board of Trustees is responsible for:

- Take strategic leadership responsibility for the school's safeguarding arrangements
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation
- Ensure that all Trustees/Local Governing Committees receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly
- Ensure that staff read, understand and follow relevant parts of KCSIE September 2025, and at least, part one and Annex B
- Ensure a named Trustee takes leadership responsibility for safeguarding arrangements and receives appropriate training in the management of safeguarding
- Attend Prevent training at least every two years
- In each school, appoint an appropriate member of staff from the SLT to the role of DSL and one or more deputy DSLs to provide support and ensure that they are trained to the same standard as the DSL ensuring that the roles are explicit in their job description(s).
- Ensure the provision of appropriate support, funding, training, resources, and time for the DSLs to carry out their role

Trust and School Safeguarding and Child Protection Policy

- Support and monitor a Trust wide approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and ethos remains consistently high in every school
- Ensure systems are in place so that children can confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the voice of the child is heard and acted upon.
- Ensure effective and appropriate policies and procedures are in place
- Make sure that pupils are taught about safeguarding, that safeguarding is embedded within the curriculum, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children
- Ensure every school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems
- Ensure that at least one person on any recruitment panel has undertaken safer recruitment training
- Ensure that all staff receive relevant safeguarding and child protection training updates, including online safety and expectations and responsibilities relating to filtering and monitoring systems e.g. emails, as required, but at least annually, including a thorough induction
- Ensure there are procedures in place to report low level concerns over any member of staff working in the Trust
- Ensure there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- In every school, appoint a designated teacher to promote the educational achievement of CLA and ensure that this person has undergone appropriate training
- Ensure that the appropriate level of check is completed on Trustees and Local Governors

Trust and School Safeguarding and Child Protection Policy

- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- Ensure that online safety is an interrelated and running theme through all aspects of safeguarding and that children are safe online by ensuring that appropriate filters and monitoring systems are in place and regularly checked.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future
- Ensure staff in school are aware of, and policies are personalised to reflect, an understanding of specific issues such as child-on-child abuse and safeguarding children with disabilities and special educational needs
- Ensure schools partake and complete the S175/175 audit tool as directed by the Local Authority and undertake additional peer to peer Trust led safeguarding reviews.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements
- Ensure that all practice and procedures operate with the best interests of the child at the centre with a firm child centred approach

The Designated Safeguarding Trustee is responsible for:

Liaising with the board of Trustees on an agreed basis with regards to safeguarding matters.

- Undertaking any responsibilities delegated to them by the Board of Trustees.
- Liaising with the Safeguarding Lead for the Trust and Local Governing Committee Safeguarding leads for each school on an agreed basis regarding safeguarding matters.
- Taking leadership responsibility for safeguarding arrangements within the Trust.
- Ensuring that accurate and effective recordkeeping of concerns and incidents is in place.
- Ensure that online safety, including filtering and monitoring systems, run as an interrelated and running theme throughout the whole Trust safeguarding approach, including in each school.

All staff within the Trust and its schools have a responsibility to:

- Consider, at all times, what is in the best interests of the pupils in the Trust.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Create and maintain safe environments in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the Trust's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.

Trust and School Safeguarding and Child Protection Policy

- Be aware of the role and identity of the DSL and DDSL(s) within the relevant school.
- Undertake safeguarding training, including online safety training (including an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction and annually.
- Receive and understand child protection and safeguarding (including online safety) updates in addition to formal annual training.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSC, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSC and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL within the relevant school.
- Be aware of and understand the Trust's procedure to follow in the event that a pupil confides they are being abused, neglected or exploited.
- Maintain appropriate levels of confidentiality.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to their school's DSL or DDSL(s) if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.
- Understand the process for reporting concerns over professional adults, including low level concerns and concerns that meet the threshold of harm.

All teachers within the Trust, including headteachers, have a responsibility to:

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

Headteachers in each school throughout the Trust have a duty to:

- Ensure that all safeguarding policies and procedures are adopted, understood and implemented in all aspects of practice by all staff.

Trust and School Safeguarding and Child Protection Policy

- Provide staff within their school with the appropriate policies and information upon induction.
- Work directly with the DSL and Senior Leaders to ensure strategic oversight of all aspects of safeguarding responsibilities are being fulfilled.
- Ensure all staff receive training annually and regular updates in addition to ensure they can fulfil their safeguarding responsibilities.
- Ensure the Designated Safeguarding Lead and any deputies are trained every two years (minimum) to fulfil their role.
- Liaise with the Trust Safeguarding Lead regarding safeguarding practice within the school and engage with annual safeguarding reviews.

Designated Safeguarding Leads have a duty to:

- Take lead responsibility for safeguarding and child protection within their school, including online safety and understanding the filtering and monitoring systems and processes in place, in line with annex C in Keeping Children Safe in Education 2025.
- Raise the profile of safeguarding in their school, including the impact of trauma on children.
- Ensure all staff receive appropriate training at induction, including online safety and expectations and responsibilities relating to filtering and monitoring, and that this is updated regularly, at least annually.
- Report on an agreed basis to the Local Governing Committees and Trust Safeguarding Lead via the agreed route of communication.
- Refer cases:
 - To Children's Social Care (CSC) where abuse and neglect are suspected, and support staff who make referrals CSC.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Ensure each member of staff within their school has access to and understands the Trust-wide and individual school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Ensure that accurate and detailed records of safeguarding concerns are kept securely, including the rationale for decisions made and subsequent actions.
- Work with the Trust Safeguarding Lead and Board of Trustees to ensure their school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.

Trust and School Safeguarding and Child Protection Policy

- Understand the importance of information sharing within the Trust, including within school, with the Trust's other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Adhere to any other school-level duties outlined in their school's policies and their job description.
- Adhere to any safeguarding arrangements specified in the Trust's funding agreement.

The Trust Safeguarding Lead is responsible for:

- Work with Trustees to provide strategic management of safeguarding and child protection, including online safety and filtering and monitoring systems, on behalf of the Trust in line with policies, statutory guidance and best practice.
- Ensuring ongoing development of a strong safeguarding culture across the Trust, including arranging/delivering training, reviewing practice in each individual school and consulting on individual cases where required.
- Work closely with the Local Authority to ensure local safeguarding arrangements are fully implemented and procedures followed.
- Providing support and consultation for DSLs and DDSs with their safeguarding functions in each school.

3. Abuse, neglect and exploitation

This section looks at the definitions of the four categories of abuse and details specific safeguarding issues.

Abuse is defined as 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, for example, 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.

Physical abuse A form of abuse which 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. Staff are aware of Female Genital Mutilation, a form of Physical abuse.

Emotional abuse is defined as the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only

Trust and School Safeguarding and Child Protection Policy

insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse is defined as involving forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include 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 defined as 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
- provide suitable education

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

- ALL staff will be aware of the indicators of abuse, neglect and exploitation, remain vigilant and always raise concerns with the DSL.
- All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with contextual factors outside the school and/or can occur between children outside of these environments; this includes being aware

Trust and School Safeguarding and Child Protection Policy

that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms.)

- ALL staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.
 - ALL staff understand that children who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported - Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.
 - ALL staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, as outlined in annex B of Keeping Children Safe in Education 2025, reporting any concerns in the appropriate manner to the DSL. Specific issues include (but are not limited to):
4. **Child-on-child abuse – including sexual harassment/violence and harmful sexual behaviour**

The Trust will refer to the specific guidance in Keeping Children Safe in Education Part five: Child on Child Sexual Violence and Sexual Harassment.

Child on child abuse, including sexual violence and harassment, as defined above, will not be tolerated within the Trust or any of its schools. Pupils will be taught about how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled. Reports of upskirting and sexual harassment will be managed by school in line with the Behaviour Policy and statutory guidance.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers and will not tolerate abuse as “banter” or “part of growing up”.

The procedures for managing instances of child-on-child abuse is outlined in the Child on Child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school’s Anti-Bullying Policy, where relevant.

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

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.

Trust and School Safeguarding and Child Protection Policy

- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of pupils with SEND who, evidence suggests, are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils who, evidence suggests, are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

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

Schools and DSLs will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues.

Trust and School Safeguarding and Child Protection Policy

Following a report of child-on-child sexual harassment, assault, violence or harmful sexual behaviour, the Designated Safeguarding Lead (or deputy) will make an immediate risk and needs assessment, considering:

- the child that has/may have been harmed
- the child who has/may have harmed
- all other children (and if appropriate adult students and staff)
- Refer to guidance in Keeping Children Safe in Education Part 5.

DSLs in schools will be supported by the Trust Safeguarding Lead to ensure an appropriate assessment of behaviour is completed, including considering age and developmental stage of the child/ren involved. Guidance will be taken from [Wirral-HSB-Tool.pdf](#)

All cases that are assessed and categorised as abusive/violent (including all reports of rape), will be referred to the police and Children's Social Care. School will always aim to be transparent and share information with families, however cases of child on child abuse and harmful sexualised behaviour can be complex and where external agency input is felt necessary, advice will be sought on what information can be shared by school. This may mean that families are not immediately informed where a concern has been reported.

Where required, risk assessments will be written, informed by the voice of the children involved, consulted on with parents and any agencies involved, shared on a need to know basis with relevant staff and kept under review as a minimum, termly.

The DSL will work closely with other agencies where needed and ensure ongoing multi-agency work to support all parties involved.

Pupils and families can seek advice from [Lucy Faithful Foundation](#) for concerns around any type of sexual abuse, including child on child abuse.

5. Domestic abuse

In line with the Domestic Abuse Act 2021, domestic abuse is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. Abusive behaviour includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

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

Trust and School Safeguarding and Child Protection Policy

Operation Encompass

Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse. Children are recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

Through Operation Encompass the police will share information with school about ALL police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information will occur PRIOR to the start of the next school day. The notification will inform us about the context of the incident and will include the Voice of the Child.

There is a legislative requirement for police forces to share information with educational settings through Operation Encompass under the Victim and Prisoners Act 2024. The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

School considers each notification in relation to the best way to support the pupil and family. Advice may be sought from Head of Safeguarding, police and/or Children's Social Care or the Operation Encompass Helpline following a report being received to ensure that the safety and welfare of the child is paramount. School are aware that any actions taken should be considered in terms of risk and no action should be taken that would increase risk to the pupil/victims.

The lead person for Operation Encompass for the Trust is: Lisa Finnegan

The school lead for Operation Encompass is: Sarah Lees Head of School

Advice on supporting children experiencing domestic abuse is available via the Operation Encompass Helpline: 0204 513 9990

For more information on Operation Encompass, please visit: www.operationencompass.org

6. Homelessness

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

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to" or frequent moves.

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

Trust and School Safeguarding and Child Protection Policy

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

7. Child Exploitation (CE)

Child Exploitation is an umbrella term which covers the two commonly known types of exploitation, child criminal exploitation (CCE) and child sexual exploitation (CSE). The Trust recognises that all forms of child exploitation are criminal. For the purposes of this policy we will define CCE and CSE.

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

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence (this could be online or through technology)

Specific forms of CCE can include:

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

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

Staff will be aware of the indicators that a pupil is the victim of CCE, including:

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

Criminal exploitation of children can include County Lines. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) by first responders and

Trust and School Safeguarding and Child Protection Policy

should be considered in addition to normal safeguarding procedures. Whereas schools are not defined as a first responder, they can request a referral be completed by agencies defined as first responders.

As well as the general indicators for CCE, all staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line, moving drugs, collecting money
- Being found in accommodation that they have no connection to
- Owing a 'debt bond' to their exploiters
- Having their bank account used to facilitate drug dealing.

Child Sexual Exploitation is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence, this could be online or through technology.

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

All staff will consider the language and terms used when raising concerns and providing ongoing support to pupils who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

Staff will be aware of the key indicators that a pupil is the victim of CSE, including:

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

Trust and School Safeguarding and Child Protection Policy

- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

8. **Child abduction and community safety incidents**

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

The Board of Trustees will ensure that information about community safety incidents is shared across all schools in the Trust, especially those in close geographic proximity to one another.

Joint solutions and strategies will be implemented where a community safety incident impacts pupils at more than one school within the Trust.

All Trust schools have a lockdown procedure in the event of a serious incident impacting on the immediate safety of the school.

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

9. **Modern slavery**

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

All staff within the Trust will be aware of and alert to the signs that a pupil or family member may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery. Where modern slavery is suspected and the victim is under the age of 18, a referral to the [National Referral Mechanism](#) will be requested by school via a first responder agency. Where the victim is identified to be an adult, a referral will be discussed and if consent provided, school will request a first responder agency makes the referral. Where consent is not provided, a request by school via a first responder agency will be made for a referral under Duty to Notify.

In addition to this, schools will follow local safeguarding arrangements and refer to statutory safeguarding partners.

10. **Female Genital Mutilation**

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

Trust and School Safeguarding and Child Protection Policy

The Trust ensure that teachers within its schools are aware they have a mandatory duty to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action.

11. Forced marriage

Forced marriage is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the [Forced Marriage Unit](#). It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, as this will alert them to the concerns and may place the pupil in further danger.

12. Extremism and radicalisation

For the purposes of this policy, “**extremism**” is defined by the government as the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the Trust's wider safeguarding duties. Schools within the Trust will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. The Trust will ensure procedures are in place for staff to be made aware of changes in pupils' behaviour which could indicate that they may need help or protection. The Trust will also ensure that staff can use their professional

Trust and School Safeguarding and Child Protection Policy

judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a referral to Channel and are aware of how to do so.

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

The Prevent duty

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

All staff will complete PREVENT training at point of induction. This will be regularly updated.

Where there are concerns raised under the Prevent Duty, the school will follow local arrangements for referring to the Local Prevent Team.

[Preventing Radicalisation \(Prevent\) | wirral.gov.uk](https://www.wirral.gov.uk/prevent-radicalisation)

The Trust PREVENT lead is: Lisa Finnegan

The school PREVENT lead is: Sarah Lees

13. Mental health

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

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

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

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

Trust and School Safeguarding and Child Protection Policy

Schools will ensure that appropriate advice, support and where required, medical treatment is sought for pupils through immediate medical attention, early help processes or other local health services.

14. **Private fostering**

Where a child under the age of 16, or over the age of 18 with SEND, stays with someone who is not a close family relative (defined as parents, step-parent through marriage or civil partnership, aunt or uncle through marriage or blood, brother or sister or grandparent) lasts 28 days or more, this may amount to private fostering under the Children Act 1989.

Where the school becomes aware of a pupil being privately fostered, they will notify CSC as soon as possible to allow the LA/CSC to conduct any necessary checks. Where a private fostering agreement is confirmed, the child will remain open to CSC throughout the duration of the agreement. It is a criminal offence not to notify the Local Authority in cases of private fostering.

15. **Pupils with family members in prison**

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

16. **Serious violence**

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

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

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

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.

Trust and School Safeguarding and Child Protection Policy

- Having experienced child maltreatment or trauma.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

17. **Consensual and non-consensual sharing of indecent images and videos**

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

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

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

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

- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Inform the affected school's DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the school's DSL.
- Report the incident to the school's DSL.
- Reports of youth-produced sexual imagery will be managed by school level in line with this policy, the Behaviour Policy and statutory guidance.
- Indecent imagery that is not youth-produced sexual imagery will be managed by school in line with this policy and statutory guidance.

School will offer support for children through the use of the [Report Remove tool](#). Where required, school may refer to the police and CSC and may confiscate phones/electronic devices to support any potential investigation. School will consider whether there is any ongoing risk to the child/ren involved and what early help they may benefit from.

Trust and School Safeguarding and Child Protection Policy

18. Behaviour as an indicator of concern

The Trust recognises that children's behaviour can sometimes be an indicator that something isn't right for them and may be as a result of harm they have experienced previously, and/or are currently experiencing/at risk of experiencing.

All Trust staff know and have received training on behaviour as an indicator of concern and when responding to behaviour incidents will do so with professional curiosity to any circumstances that might be underpinning the behaviour.

When responding to a behaviour incident, the DSL will consider the child's lived experience within school and make inquiries into circumstances outside of school, including at home, and online.

All schools will ensure that sanctions do not compromise a child's safety.

19. Children absent from school

All Trust staff will be aware a child being absent from school is a potential indicator of abuse, neglect and exploitation, as such, these pupils are particularly at risk of experiencing harm, including but not limited too sexual abuse, exploitation, forced marriage and female genital mutilation. Staff will monitor pupils that are absent from school, particularly on repeat occasions, and actions will be taken in line with the Attendance Strategy and Policy.

The Attendance Team in school will work closely with the DSL to review concerns over absence to ensure safeguarding is paramount when considering school attendance. The Attendance Team will immediately report to the DSL where there is an attendance concern which may indicate a child is at risk of harm.

Where reasonably possible schools **will hold more than one emergency contact number for their pupils and students**. School will contact all numbers on a child's emergency contact list where an absence is unexplained. Home visits will be undertaken where concerns about absence are identified. These visits may be unannounced and will take place with the aim of ensuring the child's safety. Where there are concerns for a child and/or family's safety, a welfare check by police will be requested.

The local authority must be notified when a school is to delete a pupil from its register. Schools should contact the Admissions section on 0151 666 4600. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education or those 'unexplainable and or/persistent absences from education', follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Trust and School Safeguarding and Child Protection Policy

20. Multi-agency working

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

The schools within the Trust will be fully engaged, involved, and included in local safeguarding arrangements. [Working Together to Safeguard Children 2023](#) names education as a relevant agency, and schools will follow the statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The Trust will work with Children's Social Care, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for intervention from statutory services is identified, the schools within the Trust will allow access for CSC from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

All schools will work with agencies to allow access to children, where required and appropriate and in line with the wishes of the child/ren. School will work with agencies to inform families where external visits are taking place in school, unless to do so would prejudice a criminal investigation or place someone at risk.

Information sharing

The Trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help or statutory involvement under child protection.

When recording, holding, using and sharing information, the DSL at each school within the trust will ensure that they:

- Understand the importance of information sharing, both within their school and the trust, and with other schools on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent programme.

Considering the above, staff within the Trust will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes –

Trust and School Safeguarding and Child Protection Policy

data protection regulations do not act as a barrier to sharing information where failure to do so would result in a child being placed at risk of harm.

Staff members within the Trust and its schools will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If school staff members are in doubt about sharing information, they will speak to their school's DSL or DDSL(s).

Where there are concerns about another agency withholding information requested for purposes of safeguarding children, schools will evoke the local escalation procedures, referring to Working Together to safeguard Children 2023 and Information Sharing Guidance 2024.

21. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but in particular, staff within the Trust will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from education, care or from home.
- is missing education, or persistently absent from school, or not in receipt of fulltime education
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Have returned home to their family from care.
- Are at risk of so called 'Honor Based Abuse' such as FGM or forced marriage.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse, neglect and/or exploitation in other ways.
- Is bereaved
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.

Trust and School Safeguarding and Child Protection Policy

- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- has returned home to their family from care

The DSL in each school will support staff in decision making where early help is appropriate. Operational tasks including liaising with other agencies and setting up an inter-agency assessment may be delegated to a trained member of staff where appropriate, with the oversight of the DSL. The local early help process will be followed as required.

All referrals to Early Help services can only be made with explicit consent from an adult with parental responsibility, or the child themselves where deemed to be able to give consent in line with age, development and competency. Where consent is not forthcoming, school will continue to work closely with the family in their best interests to support identified need.

Staff within the Trust may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

All cases will be kept under constant review and consideration given to a referral to CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

22. Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will quality assure the provision, including obtaining written confirmation that the provider has conducted all relevant safeguarding checks on staff.

School remain responsible for knowing where children attending alternative provision are throughout school hours and will ensure regular checks on attendance and welfare are made, liaising with the DSL in the setting, where appropriate.

Schools commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – schools will be mindful of the additional risk of harm that these pupils may be vulnerable to. All schools will ensure children in alternative provisions are visited regularly to seek their views to inform the cycle of review.

23. Work experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

School will ensure that checks on attendance are made for children on work experience and placements know to inform the school if a child does not attend as expected on a placement. This will be followed up with the school's first day absence procedure.

24. Pupils potentially at greater risk of harm

Trust and School Safeguarding and Child Protection Policy

All schools within the Trust recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

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

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare and educational outcomes, e.g. considering the provision pastoral or academic support and support with behaviour.

Home-educated children

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

In line with the Education (Pupil Registration) (England) Regulations 2006, each school within the Trust will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from a school within the Trust for EHE, the school, in collaboration with the Trust, LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Where children are removed from roll for Elective Home Education and there are safeguarding concerns, school will ensure that concerns are shared with the LA.

Children in the care/previously in the care of the Local Authority and children cared for in guardianship

Children most commonly become looked after because of abuse, neglect and/or exploitation. Because of this, they can be at potentially greater risk in relation to safeguarding. Looked After Children (LAC) and previously LAC (PLAC), also known as care leavers, can also remain vulnerable after leaving care. Sometimes, children reside with family members or friends through a guardianship where circumstances have meant they have not been able to be cared for by their biological parents. This can include, but is not limited to, abuse, neglect and exploitation.

The Board of Trustees will ensure that staff in the Trust have the skills, knowledge and understanding to keep children looked after, previously looked after children and children in

Trust and School Safeguarding and Child Protection Policy

guardianships safe. This includes ensuring that the appropriate staff have the information they need, such as:

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

The DSL will work with the Designated Teacher for Looked After Children in each school and ensure the contact details of the Social Worker for each LAC/PLAC is known, where applicable. School will ensure close links with the Virtual School and complete Personal Education Plans for Looked After Children in line with the placing authority's arrangements.

Children cared for by a legal guardian ordered by court will be supported in school through pastoral systems where required. All schools will require sight of any court orders to ensure details are verified for confirming parental responsibility and relevant information will be stored securely.

Young carers

A young carer is someone under the age of 18 who helps to care for a family member, relative or friend. A young person aged 16-25 with caring responsibilities can be known as a young adult carer. This includes practical support, for example household activities such as cooking and cleaning, individual support with medication or personal care as well as emotional support that without this help, the person would struggle to cope.

All staff will be alert to opportunities to identify and support children with caring responsibilities and liaise with the DSL who will help coordinate Early Help where required.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff within the Trust and its schools will be aware of the following:

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

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL in the affected school will liaise with the school's SENCO, as well as the pupil's parent where appropriate, to ensure that the pupil's needs are met effectively.

Trust and School Safeguarding and Child Protection Policy

LGBTQ+ pupils

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

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

25. Adverse Childhood Experiences and trauma

The Trust acknowledges that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

All staff will be made aware of the long-lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development through regular training.

Where a pupil is known to have experienced trauma, appropriate arrangements will be made to provide support based on the needs of the pupil and in line with all relevant guidance and policies. This may include close multi-agency working with external services and making special considerations for behaviour.

The Trust acknowledges that some children will experience trauma due to incidents that are not known about by staff. The Trust requires all staff to maintain curiosity around children's lived experiences and look for opportunities to support children and families based on the 5 principles for an evidenced-informed response to those who have experienced trauma, as outlined in the UK Trauma Council's [Guidance for Critical Incidents](#).

26. Use of school premises for non-school activities

Where the school hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where the school provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The school will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The school will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of

Trust and School Safeguarding and Child Protection Policy

the premises, and specify that failure to comply with this would lead to termination of the agreement

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the schools in the Trust to effectively safeguard pupils and adhere to local and Trust-wide safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the police, if necessary.

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

27. Safeguarding concerns

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

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

All staff have received training on how to report a concern about a pupil both internally to the DSL or Deputy DSL and how to refer to Children's Social Care and police. Where a member of staff or visitor have a concern about a pupil where they have reasonable cause to suspect they are at risk of or have experienced significant harm, the concern should be immediately reported to the DSL or a Deputy in their absence. If this is not possible then the adult with the concern should contact Children's Social Care for the geographical location where the child resides and police directly and the DSL informed as soon as is possible.

The Trust will approve and continuously monitor the procedures within each school for reporting concerns about pupils' welfare. Annual reviews of safeguarding practice will be conducted by the Trust Safeguarding Lead, to assess whether each school:

- Has clear procedures for staff to report concerns to their DSL.
- Has clear procedures for their DSL to make referrals to their LA.
- Has trained its staff members to understand their responsibilities in these procedures.
- Has clear and maintained procedures in place for internal communication and safeguarding

Trust and School Safeguarding and Child Protection Policy

- Has ensured all staff are aware of their obligations in relation to confidentiality and information sharing.

The outcomes of these visits, along with data from safeguarding systems and processes will be shared with Local Governing Committees and Trustees through termly reporting. In addition, there will be regular meetings with the Local Safeguarding Governor and school DSL, at least annually, to monitor progress and provide challenge and support.

28. Managing referrals

All Trust staff, in particular the DSLs and DDSLs, will be aware of the Wirral Safeguarding Children Partnership's arrangements in place for referring to statutory agencies. The DSL in each school will provide staff members with clarity and support where needed. When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

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

Where staff have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, school will contact the police directly in addition to referring to Children's Social Care under section 47 Children Act 1989.

The referrer will be notified by Children's Social Care of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support. Where there are professional disagreements about the level of support and protection required for a child, school will evoke the escalation procedures of the Local Safeguarding Partnership where the child resides. School will be supported in this by the Trust Safeguarding Lead.

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

Trust and School Safeguarding and Child Protection Policy

29. Safeguarding Training

All staff within the Trust receive safeguarding training at point of induction and annually (as a minimum). This includes, but is not limited to, statutory guidance and updates, how to identify abuse/neglect/exploitation, how to report concerns to the DSL, referrals to Children's Social Care, staff conduct and specific safeguarding topics. Where settings have an EYFS provision, staff receive training meeting the requirements set out in Annex C of the EYFS Framework.

All staff will complete PREVENT training every two years. This will be accessed via the Home Office website.

DSLs will receive training every two years covering the requirements in Keeping Children Safe in Education Annex C. In addition to this, DSLs will access a range of additional professional development opportunities to continue to upskill them in their role.

DSLs will complete the Key Adult Training through Operation Encompass to support them in their role supporting children and families experiencing domestic abuse.

Staff involved in recruitment of staff will access accredited safer recruitment training.

30. Online Safety

The Trust is committed to keeping children safe online. The Trust recognises that addressing online safety issues should form an integral part of the safeguarding arrangements in every school and that online safety should be an interrelated and running theme throughout the safeguarding approach across the Trust.

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

All Trust schools use Securus [Monitoring & Safeguarding Software for Schools | Securus](#) to ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material. This system will be monitored and reviewed with any inappropriate or concerning behaviours or searches being followed up appropriately.

All Trust staff will be aware that ongoing in-person monitoring is required in addition to the software in place as it is vital staff don't rely solely on IT systems as this may leave some children vulnerable.

All Trust schools will also ensure that it meets the [filtering and monitoring standards](#) published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Trust and School Safeguarding and Child Protection Policy

Regular checks will be carried out by each school with the support of the Central Team and IT support.

Each school will ensure appropriate communication with parents to support pupils being kept safe online whilst accessing online spaces and devices outside of school.

All Schools are aware of the DfE guidance on the Generative Use of AI in Education 2025 and ensure that safety is the main priority when deciding on use of AI in school.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Acceptable Use Policy.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the Head or DSL, following the appropriate procedures. The Trust is committed to keeping pupils safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner.

School will therefore ensure that:

- informed parental consent is obtained to take and use photographs and/or videos of children, for use in school, to market the school or to share on social media / internet
- staff, visitors and volunteers do not use their own mobile phones or devices to take or record any images of children.
- Acceptable Use of Technology Policy is shared by school with all key stakeholders for explicit agreement on terms of use for school devices and online use.

Staff working in EYFS provision must ensure mobile phones and personal electronic devices are stored securely in areas where children do not have access. All personal electronic devices are strictly prohibited from areas where children access in EYFS provision.

All electronic devices, including school devices, are strictly prohibited from areas where personal/intimate care takes place in all settings. All concerns over potential mis-use of any electronic devices, including school devices and use or presence of a device in areas where personal/intimate care takes place, should be immediately reported to the Head or DSL.

31. Concerns about staff and safeguarding practices

If a staff member in a school within the Trust has concerns about another member of staff (including supply staff and volunteers), it will be raised with the headteacher of that school. If the concern is with regards to a headteacher within the Trust, or where they may be a conflict of interests, concerns will be raised with the Trust Safeguarding Lead.

Processes for reporting low level concerns over a member of staff are outlined in the Trust Low Level Concerns Policy and Code of Conduct Policy.

If a staff member feels unable to raise an issue within school, they should follow the Whistleblowing Policy. If staff feel unable to follow the Trust's Whistleblowing Policy, they

Trust and School Safeguarding and Child Protection Policy

should access other whistleblowing channels such as the NSPCC whistleblowing helpline on 0800 028 0285.

32. Allegations of abuse against staff

All allegations against school staff, Trust staff, supply staff, volunteers and contractors will be managed in line with the relevant the procedures laid out by the individual school at which the staff members work or have worked. The Trust will ensure its schools are equipped to manage all allegations against staff, including those who are not employees of schools within the Trust, and that the affected schools liaise with the relevant parties.

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

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

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

All staff will be made aware of and receive training on reporting of concerns, including being made aware of the role of the Local Authority Designated Officer (LADO).

[LADO Allegations - Wirral Safeguarding Children Partnership](#)

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them.

General advice for whistleblowing can be found [here](#)

NSPCC whistleblowing advice line: [Click here for website](#) Tel: 0800 028 0285

Low Level Concerns

The Trust will strive to embed a culture of openness, trust and transparency in which the Trust shared values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff. The Trust will ensure that all staff are aware of how to recognise and report **low level concerns** around staff behaviour or conduct

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

Trust and School Safeguarding and Child Protection Policy

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

The Trust will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

The Trust will ensure that all staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All staff are clear on how to report low level concerns and will be empowered to do so. Staff must report their concerns to the Headteacher. If concerns are surrounding the Headteacher, this must be referred to The Trust Safeguarding Lead . Guidance from Keeping Children Safe in Education 2025 will be followed in view of recording and storage of such concerns.

If in doubt whether the concern is a low-level concern, the Head will consult with LADO for guidance.

The Board of Trustees will ensure low level concern procedures and staff behaviour expectations are clearly addressed within the staff code of conduct and procedures are implemented effectively, ensuring that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

33. Communication and confidentiality

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

Trust and School Safeguarding and Child Protection Policy

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

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

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL of the affected school will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL of the affected school will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. If parents cannot be reached, this will not delay sharing information with external agencies where there is a need for protection and in line with guidance. External agencies will be invited to these discussions where necessary.

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

34. Record keeping

The Trust ensures that all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school.

Information should be kept confidential and stored securely.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the DSL.

Trust and School Safeguarding and Child Protection Policy

The Trust uses CPOMS, which is an electronic recording safeguarding system. All staff using CPOMS will adhere to the Trust Protocols for Safeguarding Recordkeeping. On occasions, it is possible that records would need to be amended to correct time/date, add additional information or amend information for clarity and accuracy. This is recognised to be in line with best practice and to meet the expectations above, as set out in Keeping Children Safe in Education 25. An original copy of the recording will always be available via CPOMS.

35. Safer recruitment

The Trust prioritises the safety and integrity of all schools and Central team through best practice safer recruitment practices. This includes accredited training to upskill all staff involved in recruitment to be able to identify, deter and reject unsuitable applicants at every stage of the recruitment process as well as develop an ongoing culture of vigilance for all employees, volunteers, agency staff and contractors.

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

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

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

The Board of Trustees will ensure that schools conduct the appropriate pre-employment checks for all prospective Trust employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all Trustees and Local Governors, volunteers, and contractors within the Trust.

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

Referral to the DBS

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

Single central record (SCR)

Trust and School Safeguarding and Child Protection Policy

Each school keeps an SCR which records all staff, including agency and third-party supply staff (for longer placements), and teacher trainees on salaried routes, who work at the school. This is regularly audited by the school as well as the Trust to ensure that the document is compliant and all pre-employment checks are being carried out lawfully.

All members of the proprietor body are also recorded on the SCR.

The MAT holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions
- Any other information deemed relevant.

If any checks have been conducted for volunteers or Trustees/Governors, these may also be recorded on the SCR. Risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, these risk assessment will be recorded.

The details of an individual will be removed from the SCR once they no longer work at the school.

36. **Monitoring and review**

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

Any changes made to this policy will be communicated to all members of the Trust. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is **September 2026**