

## HISP Mult-Academy Trust

Policy Title	Safeguarding and Child Protection Policy and Procedures
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Approved by:	HISP Trust Board
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## Document Control

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## Summary of Changes (July 2025)

### Policy Structure Updates

- Appendix D (Safer Recruitment) has been removed from this policy and is now a standalone document: Safer and Inclusive Recruitment Policy.
- Information sharing around sexual violence and harassment has been moved to Appendix G.
- Appendix K section on Use of Physical Interventions has been removed. Relevant guidance is now within the HISP Code of Conduct (section 5.4).
- Appendix E: Significant updates and detail for managing potential low-level concerns

**Updated Contact Information:** MASH, LADO, safeguarding adults, and HISP school contact details updated in Appendix A, Section 1.

### Safeguarding Procedures

- Section 2: Legislation and guidance references updated with KCSiE 2025 and RSHE Statutory Guidance (July 2025)
- Section 5.1: Condensed for clarity. Explicit inclusion of trainees and Inspiring Future Teachers. Addition: Curriculum planning, including RSHE, must be overseen by the DSL.
- Section 5.5: Clarified expectations that all settings implement the HISP Trust Safeguarding Policy.

- Section 5.6: Revised to improve clarity around strategic safeguarding oversight.
- Section 5.7: Updated to include reference to Teaching Regulation Agency (TRA) in allegation management. Update: Ensure RSHE delivery is aligned with this policy, and staff delivering it are supported and trained to manage disclosures and sensitive content.
- Section 7.5: Updated to be aligned with RSHE statutory guidance.
- Section 7.6 & 7.7: Responding to a Disclosure: Strengthened with more specific, supportive guidance for staff. Update: Staff delivering RSHE must be alert to the possibility of disclosures during or following sessions. Any concerns must be reported through the safeguarding procedures immediately. The DSL should ensure a safeguarding-trained adult is always available during RSHE delivery.
- Section 6.3: Addition - DSLs and Headteachers must ensure that RSHE materials are made available to parents in an accessible and transparent way, in line with DfE guidance. Parental concerns should be addressed respectfully but in the context of the school's safeguarding obligations.
- Section 17.1: Addition - Staff involved in the delivery of RSHE must receive regular safeguarding training specific to managing disclosures and teaching sensitive content (e.g. pornography, coercion, gender-based harm)
- Appendix H: Significant updates to SCR detail

### **Information Sharing and Allegations**

#### **Section 8:**

- Allegations meeting the harm threshold: must inform the Executive Director of Education.
- Allegations against a Headteacher: must inform the Trust DSL (who will inform the Chair of Governors)

### **Code of Conduct**

- Section 21 added to formally reference the HISP Code of Conduct.
- Section 21.4 (Recruitment):
  - All senior leaders and at least one governor are expected to be Safer Recruitment trained.
  - All interview panels must include a panel member trained within the last two years.

### **Other Updates**

- Section 10: Streamlined and signposted to “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (March 2024, GOV.UK).
- Gendered language minimised or removed throughout the policy.
- The list of groups of children who may be more vulnerable to safeguarding risks, including abuse, neglect, and exploitation — due to additional barriers to recognition or disclosure — has been removed from the main body of the policy and relocated to a dedicated appendix for ease of reference and future updating.]

Section 18: Addition - Review of RSHE content and delivery will be part of school based annual safeguarding monitoring and DSL assurance activities. This will quality assured through the annual Trust safeguarding review.

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## 1. Aim of policy

**1.1** At HISP, we recognise the significant positive impact of a collaborative approach across our Trust on supporting and protecting children in and beyond our communities. All staff within the Trust are responsible for and committed to providing an environment that safeguards and promotes the welfare, safety, and health of all our children.

**1.2** The aim of the policy is to:

- Protect children from any maltreatment or harm and prevent any impairment of their health and/or development
- To ensure each school/setting offers a safe and supportive environment for all children under its care and creates a culture of vigilance throughout the organisation
- Ensure all staff, trustees, governors, volunteers, and visitors are aware of and clearly understand their statutory safeguarding responsibilities
- Outline how all staff, trustees, governors, volunteers, and visitors will meet their safeguarding duty and protect children from harm
- Empower every child, regardless of their background or circumstances, to have the best possible opportunities in life.

**1.3** HISP implement the following approach to safeguard and promote the welfare of children:

- **Prevention:** HISP schools, Inspiring Future Teachers, Teaching School Hub, Maths Hub and the One Trust Services will foster a culture where pupils feel safe, valued, and able to build trusted relationships with staff. Children will be encouraged to speak openly and know they will be listened to. All staff and volunteers will receive regular safeguarding and child protection training, including the importance of professional curiosity and recognising that some children may be unable or unwilling to disclose abuse, exploitation, or neglect, or may not recognise it as harmful. Safeguarding, including online safety, will be actively taught through a broad, balanced, and planned curriculum
- **Protection:** All staff, trustees, governors, volunteers, and visitors engaged in regulated activity with children undergo a thorough safer recruitment process and receive appropriate training and support to respond sensitively and effectively to safeguarding and child protection concerns.
- **Support:** Schools will provide structured systems of support for all pupils and appoint appropriately qualified and experienced staff (DSLs and DDSLs) to provide advice, training and support around safeguarding concerns.
- **Working with parents/caregivers and external agencies:** High quality communication with parents and carers to ensure appropriate support and actions are undertaken. Links with external agencies are strong with contextual safeguarding priorities for each school built into the safeguarding curriculum.

- Commitment: every member of the HISP community is committed to safeguarding and to creating a proactive culture of vigilance to prevent harm, ensure safe environments to support children's well-being.

**1.4** HISP commits to acting in accordance with [Keeping Children Safe in Education \(2024\)](#) (KCSIE) and Working Together to Safeguard Children (2023). This policy does not aim to replicate the guidance in full. Therefore, the policy should be read in conjunction with at least Part One and Annex B of Keeping Children Safe in Education (2024).

**1.5** Whilst the policy primarily focusses on the safeguarding of children, it also references the action to be taken if any member of the Trust community becomes concerned about the safety of welfare of an adult at risk, aged 18 or over.

**1.6** A summary of key information from this policy can be found in Appendix K.

## 2. Legislation and statutory guidance

This policy sets out how HISP carries out its statutory responsibility to safeguard and promote the welfare of pupils. This includes:

### 2.1 Statutory Guidance

- [Keeping children safe in education 2025](#)
- [Working together to safeguarding children 2023 \(updated Feb 2024\)](#)
- [Relationships Education, Relationships and Sex Education and Health Education guidance](#)
- [Multi-agency statutory guidance on female genital mutilation \(2020\)](#)
- [Early Years Foundation Stage \(2024\)](#)
- [Teachers' Standards July \(2021\)](#)
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

### 2.2 Legislation

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- [Statutory guidance on FGM](#), Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#),
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children



- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#)
- [The Public Sector Equality Duty \(PSED\)](#)
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#),
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- This policy also complies with our funding agreement and articles of association.

**2.3** HISP also has regard to the following guidance and reviews relating to safeguarding, including:

- Revised Use of Reasonable Force: Advice for headteachers, staff and governing bodies (2025)
- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)
- Information Sharing: Guidance for Safeguarding Services (July 2018)
- Teaching Online Safety in schools (2023)
- DfE Guidance on Relationships education, relationships and sex education (RSE) and health education (2019, updated 2021)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024)
- Child Protection in England: National review into the murders of Arthur Labinjo-Hughes and Star Hobson (2022)
- Local Child Safeguarding Practice Review: Child Q (2022)
- Searching, Screening and Confiscation (2022)
- Protecting Children from Radicalisation: The Prevent Duty (2015)
- Filtering and monitoring standards for schools and colleges (2022, updated 2024)

## **2.4 Local guidance**

- <https://hipsprocedures.org.uk/>
- <https://pdscp.co.uk/>

### 3. Definitions

**3.1** Safeguarding and promoting the welfare of children means:

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

**3.2 Child protection** is part of safeguarding and refers to specific actions and measures taken to protect children who are suffering, or are at risk of suffering, significant harm, including abuse or neglect. It involves identifying, responding to, and addressing the immediate safety needs of vulnerable children. This includes harm that occurs inside or outside the home, including online.

**3.3 Safeguarding** is a broader concept that encompasses all policies, procedures, and practices designed to promote the welfare of children and protect them from harm. It includes preventing harm, ensuring safe environments, and taking proactive steps to support children's well-being.

For the purposes of this policy, the term 'safeguarding' refers to everything all schools do to keep children safe and promote their welfare, including (but not limited to):

- Supporting pupils' health, safety and well-being, including their mental health;
- Meeting the needs of children with special educational needs and/or disabilities;
- The use of reasonable force;
- Meeting the needs of children with medical conditions;
- Providing first aid;
- Educational visits;
- Intimate care and emotional wellbeing;
- Online safety and associated issues;
- Appropriate arrangements to ensure school security, taking into account the local context;
- Keeping children safe from risks, harm and exploitation; and
- Child protection.

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

**3.5 Child on child abuse** refers to the abuse of a child or children perpetrated by another child or children. See Appendix for more details.

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

**3.7 Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

**3.8 Children** includes everyone under the age of 18.

**3.9 Safeguarding partners** The following 3 **safeguarding partners** are identified in KCSIE (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

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

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

**3.12** Within this policy:

- **Parents/carers** refers to birth parents and other adults in a parenting role, for example adoptive parents, stepparents and foster carers.
- **'Staff' or 'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the school.

**3.13 Keeping Children Safe in Education** may be abbreviated to 'KCSIE'.

**3.14 Child abuse** is covered by the term "significant harm" and is defined in the Adoption and Children Act 2002 in the following way:

- "harm" means ill-treatment or the impairment of health or development
- "development" means physical, intellectual, emotional, social or behavioural development

- “health” means physical or mental health
- “ill-treatment” includes sexual abuse and forms of ill-treatment which are not physical

#### 4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member’s mental health needs
- Are looked after, previously looked after, or in kinship care
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

See Appendix D For more details.

#### 5. Who is responsible for carrying out this policy?

**5.1 Safeguarding and child protection are everyone’s responsibility.** This policy applies to all staff, volunteers, and governors across schools, Learning Partnerships, Inspiring Future Teachers, and the Central Team, aligning with the procedures of the three safeguarding partners. It covers extended school and off-site activities.

The Trust and its partners play a vital role in preventative education, fostering a culture of zero tolerance towards sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment. This is supported through:

- Behaviour policy

- Pastoral support system
- Curriculum planning, including RSHE, must be overseen by the DSL to ensure content is age-appropriate, evidence-based, and aligned with safeguarding practice, particularly regarding topics such as sexual violence, coercive control, online harm, and harmful sexual behaviour.
- An inclusive, regularly delivered RSHE programme covering healthy and respectful relationships; boundaries and consent; stereotyping, prejudice, and equality; body confidence and self-esteem; recognising abusive relationships (including coercive control); and understanding the laws and concepts around sexual consent, exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, honour-based violence (e.g., forced marriage, FGM), how to access support, and why sexual harassment and violence are always unacceptable.

### *5.2 The Board of Trustees will:*

- determine and keep under review the Trust's safeguarding policy;
- ensure that an effective organisation is created for the management of safeguarding and child protection concerns;
- ensure that the Trust promotes the correct attitude towards safeguarding and child protection with staff, volunteers and visitors; and
- monitor and evaluate the effectiveness of the academies' safeguarding practices and procedures.
- nominate a Safeguarding Trustee to monitor the effectiveness of this policy in conjunction with the full board.

### *5.3 The Chief Executive Officer (CEO)*

The CEO, as delegated by the Board of Trustees, is accountable for the safeguarding of children across HISP and responsible for the implementation of this policy across the Trust. The CEO reports to the Board of Trustees on all safeguarding matters. The CEO will:

- ensure that all schools within HISP, including Inspiring Future Teachers, and the HISP Teaching School Hub, have suitable safeguarding-related policies implemented in all Trust, including the behaviour policy for pupils (where applicable) and a conduct policy for staff.
- regularly review the effectiveness of the safeguarding provision across the Trust, including assessment of progress against the Trust's safeguarding strategy and review of safeguarding risks.
- ensure that this policy is reviewed annually and ratified by the Board.
- respond to low level concerns or allegations of abuse against members of the Executive Team in line with the Low-Level Concerns and Dealing with Allegations Against Staff procedures.

**5.4** The Safeguarding Trustee provides a (brief and by exception) written report to each Board meeting to report on risk in this area.

### 5.5 Academy Committees (AC)

It is the overarching responsibility of the ACs to foster a safeguarding culture within their settings, where all stakeholders are actively engaged in promoting a safe environment for children and young people. This involves continuous evaluation, feedback mechanisms, and collaboration with schools to uphold the highest standards of safeguarding practices. By monitoring and supporting the implementation of safeguarding policies, ACs play a crucial role in safeguarding the welfare of students within their communities.

The Academy Committee will:

- The AC must appoint a nominated Safeguarding Governor to monitor the safeguarding culture and report back to the AC. The Safeguarding Governor will visit the school regularly, following which a written report will be prepared for the AC.
- All those involved in governance must attend all relevant induction and annual training and development provided by the Trust. It is the responsibility of all trustees and governors to ensure they have read and understood the KCSiE document (at least Part 1, Part 2 and Annex B) and this policy and have signed a declaration confirming this has been undertaken on appointment and each time the policy and KCSiE are updated.
- The AC will contribute to the Trust safeguarding governance arrangements, supporting the Trust Central Team and Trustees to meet their governance responsibilities outlined in KCSiE, including Part 2.
- Work to facilitate a whole trust approach to safeguarding, including child on child abuse, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process;
- Ensure that policies, procedures, and training at trust level and individual schools and learning partnerships are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;

**5.6 The Trust DSL ensures** the strategic safeguarding direction for the Trust. They provide advice, oversight and assurance to ensure that safeguarding practices are compliant, consistent, and improving across all settings. They will:

- Maintain oversight of safeguarding effectiveness across all Trust schools and settings.
- Provide support to Headteachers and DSLs on safeguarding practice, policy, and statutory requirements.
- Ensure that the Headteacher in each school is responsible for putting in place and maintaining appropriate safeguarding arrangements, including:
  - Sufficient and suitably trained staffing,
  - Allocation of time and resource for safeguarding roles,
  - Adherence to statutory duties outlined in this policy and in *Keeping Children Safe in Education (KCSiE)*.

- Support Headteachers in assuring that senior and middle leaders with safeguarding responsibilities are capable and competent, and provided with appropriate professional development.
- Ensure each school has a nominated safeguarding governor who visits termly and reports on safeguarding assurance.
- Lead the Trust-wide development of safeguarding and child protection, ensuring statutory compliance and best practice.
- Support and monitor the development, implementation, and impact of safeguarding action plans at both Trust and school level.
- Represent the Trust within strategic multi-agency safeguarding partnerships and forums.
- Provide or broker operational advice and guidance to DSLs on complex cases, thresholds, and contextual safeguarding.
- Chair the Trust DSL Network and foster a culture of collaboration, learning, and consistency across schools.
- Be accountable to the Trust DSL who sets the strategic oversight of safeguarding for the Trust at Executive level.

#### Quality Assurance and Supervision:

- Provide safeguarding supervision to DSLs and other key personnel, supporting reflective practice and professional resilience.
- Conduct regular audits of child protection records and systems to identify themes and inform Trust-wide development priorities.
- Lead and coordinate quality assurance activity in relation to:
  - Safeguarding systems and culture,
  - Alternative provision placements,
  - Elective home education,
  - Children missing from education or with persistent, unexplained absence.

*5.7 Executive Headteachers/Headteachers/Heads of School/Inspiring Future Teachers/Teaching School Hub* -hold ultimate operational responsibility for safeguarding and child protection within their setting. They are accountable for the full implementation of this policy and the maintenance of a safe culture for all children, young people and vulnerable adults through:

- Ensuring that all staff (including agency staff, volunteers and adult learners):
  - Receive safeguarding information and induction on arrival,
  - Understand and follow the procedures in this policy, particularly for reporting concerns and making referrals.
- Ensuring the DSL and deputy DSLs have:
  - Adequate time, resource, training, and authority to fulfil their responsibilities,
  - Appropriate cover during absences, including during out-of-hours or off-site activity.

- Communicating this policy and safeguarding arrangements to parents, carers, and adult learners, including through the school website.
- Appointing and supporting a DSL and sufficient deputies, ensuring they are trained to the same standard.
- Acting as case manager in the event of an allegation against a staff member or volunteer (as per Appendix E), and overseeing all referral actions to the DBS/TRA where necessary.
- Ensuring the school works collaboratively with children's social care, police, health, and other partners to:
  - Promote welfare and provide early help where required,
  - Contribute to child protection plans,
  - Support statutory assessments under section 17 and section 47.
- Upholding the Teaching Standards (2012) by safeguarding pupil welfare and maintaining public trust.
- Ensuring the relevant safeguarding ratios are met in early years and primary phases.
- Making decisions on low-level concerns, in collaboration with the DSL.
- Assigning a key person for each child in the Early Years Foundation Stage.
- Promoting safe and appropriate use of technology and devices, including mobile phones and cameras.
- Ensuring the proper use of CPOMS or equivalent systems, and that staff follow reporting procedures.
- Ensuring all staff know who the DSL, DDSLs and named safeguarding governor are.
- Ensure RSHE delivery is aligned with this policy, and staff delivering it are supported and trained to manage disclosures and sensitive content.
- Embedding safeguarding into the curriculum, so pupils understand how to stay safe and seek help.
- Appointing a Designated Teacher for Looked After and Previously Looked After Children (and children in kinship care).
- Ensuring dissemination of, and adherence to:
  - The HISP staff code of conduct,
  - The whistleblowing policy and safeguarding allegations procedures.
- Leading safer recruitment in line with KCSiE (Part 3) and maintaining a compliant Single Central Record.
- Maintaining oversight of the safeguarding of all pupils placed in alternative provision, ensuring placements meet the pupils' needs and welfare.

**Each Executive Headteacher/Headteacher/Head of School/Inspiring Future Teachers/Teaching School Hub will retain accountability for all safeguarding-related matters within their school/setting.**

### *5.8 Designated Safeguarding Leads (DSL)*

The DSL is part of the Senior Leadership Team in each school, Inspiring Future Teachers, Teaching School Hub, or the One Trust Services Team, leading child protection and broader safeguarding,



including online safety and oversight of filtering and monitoring systems. DSLs receive dedicated time, funding, training, resources, and support to perform their role effectively. A list of HISP DSLs is in Appendix A, with full responsibilities detailed in Annex C of KCSiE.

**Note: Neither the Trust DSL nor the HISP Director of School Improvement and Safeguarding is the DSL for any individual schools within the Trust. The Headteacher retains full accountability.**

**5.9** When the DSL is absent, the Deputy DSL will cover. If they are not available, a member of SLT will cover. Any deputies will be trained to the same standard as the designated safeguarding lead. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

**5.10** HISP recognises the demands on DSLs and DDSLs and prioritises their wellbeing by not expecting them to monitor emails, phone lines, or CPOMS/my concerns outside working hours, except during planned trips or activities. This expectation will be communicated to staff, parents, and pupils. For staff not contracted outside term time, support information will be shared with stakeholders. To ensure child safety, schools will regularly provide contact details for statutory and non-statutory support services, including police and children's social care, through school communications and websites.

#### *5.11 All staff*

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff have a responsibility to provide a safe environment, where children can learn;

- Provide a safe learning environment for children.
- Be aware of, understand, and follow the Trust's and individual academy's safeguarding and child-on-child abuse policies, recognising their role in prevention and response.
- Complete mandatory safeguarding training to identify signs of abuse, neglect, exploitation, and harm (including FGM), understand disclosure responses, and know the school's safeguarding systems such as CPOMS/My Concerns.
- Know the identity and role of the designated safeguarding lead (DSL) and deputies.
- Read and understand Part 1 and Annex B of the DfE's *Keeping Children Safe in Education* (KCSiE) guidance annually and sign a declaration confirming this.
- Regularly familiarise themselves with key policies including the Acceptable Use Policy, Code of Conduct, and the HISP Child Protection and Safeguarding Policy.
- Understand the behaviour policy, pastoral support systems, online safety expectations (including filtering and monitoring roles), and safeguarding responses to children missing education.
- Reinforce online safety when communicating with parents/carers, informing them about children's online activities and interactions.

- Understand that children perceived as LGBTQ+ may be particularly vulnerable to targeting or abuse and provide a safe, supportive space for LGBTQ+ pupils to express concerns.
- Understand the early help assessment process and their role in identifying emerging issues, liaising with DSLs, and sharing information with relevant professionals.
- Know how to make referrals to local authority children's social care (MASH/CRS) when concerned about significant harm, and understand their potential role in social care assessments.
- Be aware of signs of abuse, neglect, exploitation, domestic and sexual abuse (including coercive control and parental conflict), and specific safeguarding issues such as grooming, CSE, CCE, serious violence, FGM, radicalisation, and emerging online threats.
- Recognise that children may be at risk of harm inside/outside home, at school, and online.
- Know that children and families may experience multiple, complex needs simultaneously.

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of Trust or individual school/setting safeguarding policy or practice, they speak to the DSL so that additional training can be arranged.

### *5.12 Virtual school heads*

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

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

## **6. Confidentiality and information sharing**

**6.1** Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between each school, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. If staff are unsure whether information should be provided, advice should be sought from the Data Protection Officer.

HISP reinforces that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe and promoting their welfare.

- If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests
- See Appendix E for guidance on information sharing regarding sexual violence or harassment.
- The government’s [information sharing advice for safeguarding practitioners](#) includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

**6.2** All schools adhere to the Data Protection Act (2018) and the General Data Protection Regulation (2018).

### **6.3 Sharing information with parents:**

- Each school will ensure the Safeguarding and Child Protection Policy is available publicly on each school’s website, it will also be available on the HISP Trust website.
- Where appropriate, staff will discuss any concerns about a child with the child’s parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.
- If notifying the parents would increase the risk to the child, it will be discussed with the local authority children’s social care team before doing so. In the case of allegations of abuse made against other children, parents of all the children involved will be contacted.
- DSLs and Headteachers must ensure that RSHE materials are made available to parents in an accessible and transparent way, in line with DfE guidance. Parental concerns should be addressed respectfully but in the context of the school’s safeguarding obligations.

### **6.4 Consent – sharing information:**

The Data Protection Act 2018 introduced ‘safeguarding’ as a reason to be able to process sensitive, personal information, even without consent (Data Protection Act, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk, or where it is not possible to gain consent.

Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

**6.5** As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

**6.6** When considering whether, or not, to share safeguarding information (especially with other agencies), staff will record who they are sharing that information with and for what reason. If a decision has been taken not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

## 7. Recognising and responding to abuse: how to take action

**7.1** If a member of staff, parent or member of the public is concerned about the safety or welfare of a child, they should report it to the DSL as soon as possible. If the DSL is not available, it should be reported to the deputy safeguarding lead/s immediately. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

**7.2** Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

**7.3** All staff will be alert to indicators of abuse (including child on child) and will report any of the following to the Designated Safeguarding Lead immediately;

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing child on child abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

**7.4** More information about our approach to child-on-child abuse (including sexual violence and sexual harassment) can be found in Appendix E.

**7.5** For more information regarding specific safeguarding issues, please see Part One and Annex B of KCSIE (2024) and Appendix C of this policy.

**7.6 Responding to a Disclosure** When responding to a disclosure from a child, staff will:

If a child makes a disclosure to you:

### 1. Listen carefully and calmly

- Stay calm, do not show shock or disbelief
- Allow the child to speak freely

- Avoid interrupting or asking leading questions
- 2. **Reassure the child**
  - Acknowledge what they've said
  - Let them know it was right to tell you
  - Explain you cannot promise to keep it a secret
- 3. **Explain what happens next**
  - Tell them you will need to share this with the DSL
  - Explain it's to keep them safe
- 4. **Record the disclosure**
  - Use the child's own words as far as possible
  - Record date, time, place and people present
  - Stick to facts, avoid assumptions or opinions
- 5. **Report immediately**
  - Inform the **DSL or DDSL in person** without delay
  - Log on CPOMS/MyConcerns the same day
  - If DSL unavailable and there's immediate risk, refer to children's social care or police directly
- 6. **Maintain confidentiality**
  - Only share information on a need-to-know basis
  - **At all times:**
    - Take every disclosure seriously
    - Do not make the child feel they're causing a problem
    - Act in accordance with this policy

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

### *7.7 Reporting and Recording a Concern*

All staff and volunteers receive safeguarding procedures guidance during induction and regular updates thereafter. Concerns must be reported promptly, in writing, using CPOMS/My Concerns or the school's designated system, and records should be created on the same day, during working hours. Staff must not delay reporting until the next day.

Staff delivering RSHE must be alert to the possibility of disclosures during or following sessions. Any concerns must be reported through the safeguarding procedures immediately. The DSL should ensure a safeguarding-trained adult is always available during RSHE delivery.

All staff and volunteers will:

- Make a written record of the concern (see Record Keeping), informing the child that this is being done.
- Pass the information to the DSL or DDSL without delay: in person for immediate or high-priority cases, and in writing for lower-level concerns. All reports to the DSL must be followed up in writing.

The DSL/DDSL will:

- Keep confidential, detailed records of all concerns, actions, and observations. These records will be securely filed and accessible only to authorised personnel (DSL, Head, or Trust Safeguarding Lead).
- Handle communication with parents/carers sensitively, contacting them when there is a concern, suspicion, or disclosure unless doing so may increase risk to the child. In such cases, advice will be sought from children's social care or the Multi-Agency Safeguarding Hub (MASH) before informing parents.
- Make or ensure referrals are made to children's social care when there is reasonable cause to believe a child is suffering, or at risk of suffering, significant harm, following Local Safeguarding Partnership procedures.

### *7.8 Concerns About Significant Harm or Imminent Danger*

If any staff member suspects abuse or imminent danger, they must notify the DSL or DDSL **immediately and in person**. Although the DSL/DDSL usually makes referrals, any staff member can refer directly to children's social care or the police and must inform the DSL as soon as possible. Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Child abuse can also be reported to your local council: <https://www.gov.uk/report-child-abuse-to-local-council> Each setting will follow local procedures for making a referral.

### 7.9 Concerns Below the Threshold for Significant Harm and No Imminent Danger

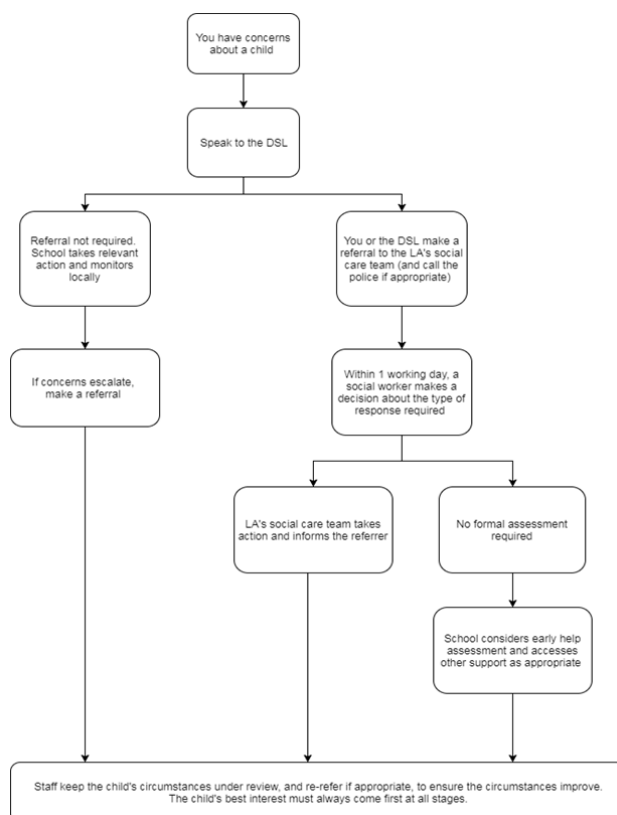
Staff should log concerns on CPOMS/My Concerns or the school's designated system at the earliest opportunity, providing sufficient information and context for the DSL/DDSL to assess the information (using the Best Practice for Logging Concerns Guidance). The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the thresholds guidance published by the local safeguarding partnership. If it is decided to make a referral to children's social care the parent/carer will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

**All concerns, discussions and decisions will be recorded in writing.**

The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- an Early Help Assessment; or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare.



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

*7.10 Early help and Vulnerable Children*

All staff are expected to recognise the signs of abuse, neglect, and exploitation and be alert to children who may benefit from early help — providing timely support when problems first emerge.

If early help is appropriate, the DSL or DDSL will usually lead on liaising with the child, family, and external agencies, arranging inter-agency assessments as needed. Staff may be asked to support these cases and, where appropriate, act as the lead practitioner. All cases must be regularly reviewed, with referrals to children's social care made if concerns persist or escalate.

Staff will be trained in the early help process, their role in identifying emerging issues, and the importance of information-sharing to support early assessment and intervention. It is vital children receive the right help at the right time to prevent escalation.

All staff are expected to monitor concerns and provide ongoing feedback to the DSL or DDSL. We recognise that any child may benefit from early help, but will be particularly vigilant where specific risk indicators are present, including (but not limited to):

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child or in kinship care.

The DSL will maintain a list of pupils who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these pupils are monitored closely and supported to achieve the best possible outcomes. Many of these children will



be looked after children, previously looked after children, children in kinship care, or have special educational needs or disabilities.

### **7.11 Referrals**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The school will be guided by MASH/CRS as to the appropriate outcome e.g., complete an Early Help Assessment (EHA) or refer to a relevant specialist agency.

All Child Protection records, including referrals, will be maintained in a confidential file at the school. The protocols as outlined in the Data Protection Policy must be followed.

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

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

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH) or CRS, police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Consent will be required before support can be delivered to any individual through the Channel programme. Contact details for the MASH and CRS can be found in Appendix A of this policy.

### ***7.12 Trigger Points and Escalation***

In the event of serious incidents such as child death, Heads should notify the Trust DSL immediately. The CEO, Chair of the Board will also be informed.

### ***7.13 If you discover that FGM has taken place or a pupil is at risk of FGM***

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

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

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

**Any teacher** who either:

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

must immediately report this to the police, **personally**. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow local safeguarding procedures.

#### *7.14 If you have concerns about extremism*

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

### *7.15 If you have a concern about mental health*

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.

All staff should be alert to behavioural or emotional signs that may suggest a child is experiencing poor mental health or developing mental health needs.

The RSHE curriculum is a key preventative and protective tool, equipping pupils with strategies to understand emotions, develop resilience, manage relationships, and seek help when needed. DSLs and mental health leads must work together to ensure RSHE content supports early identification, self-regulation and signposting to internal or external support.

Where there are concerns that mental health may be linked to safeguarding risks, staff must follow Section 7.9 and report the concern to the DSL immediately.

## **8. Concerns about a staff member, governor, trustee, supply teacher, volunteer or contractor**

**8.1** HISP recognises the possibility that adults working in the Trust may harm children, including trustees, governors, volunteers, supply teachers and agency staff.

**8.2** The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the Trust, including supply teachers and volunteers has:

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

This includes behaviour or incidents that have occurred in and outside of the Trust or individual school.

**8.3** If a concern or allegation of abuse arises against any person working or volunteering on the school site (other than the Head), that potentially meets the harm threshold, this must be reported to the Head/Director of the setting immediately and not discussed directly with the person involved. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. The Head/Director of the setting will inform the Trust DSL.

If the concerns/allegations are about the headteacher, must be reported to the Trust DSL who will inform the chair of governors.

Allegations against the any member of the One Trust Services Team must be reported to the Trust DSL.

Allegations against the any member of the Executive Team must be reported to the CEO.

Allegations against the CEO must be reported to the Chair of Trustees.

Allegations against the Chair of Governors or Chair of Trustees must be reported to the CEO.

Alternatively, staff can report the concern through the Trust Whistleblowing Procedure or directly to the Local Authority Designated Officer (LADO).

Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer as soon as possible within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made, and the police will be contacted if necessary.

**8.4** A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post because of safeguarding concerns or would have been removed if they had not resigned.

If an allegation is made relating to an incident that happened when an individual or organisation was using school premises for the purposes of running activities for children, schools will follow the same safeguarding policies and procedures, including informing the LADO.

**Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher or Director, report it directly to the local authority designated officer (LADO).**

**8.5** Early Years Providers: Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix J for more detail).

## 9. Allegations of abuse made against other pupils (child-on-child)

**9.1** At HISP we recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. (See Appendix E for more detail).

All child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent

- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

### *9.2 Procedures for dealing with allegations of child-on-child abuse*

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

### *9.3 Record keeping*

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

When a child has made a disclosure, the member of staff/volunteer should;

- record it as soon as possible after the conversation, using your setting's local procedures
- not destroy the original notes in case they are needed by a court (this includes notes taken by the member of staff);
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- use a CPOMS/my concerns/ body map to indicate the position of any injuries if relevant; and
- record verbatim statements and observations within records, rather than interpretations or assumptions

### *9.4 Creating a supportive environment in school and minimising the risk of child-on-child abuse*

HISP recognises the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between pupils, including requesting or sending sexual images
- Be vigilant to issues that could affect any student – for example, sexualised or aggressive touching or grabbing, and initiation or hazing type violence.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

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

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

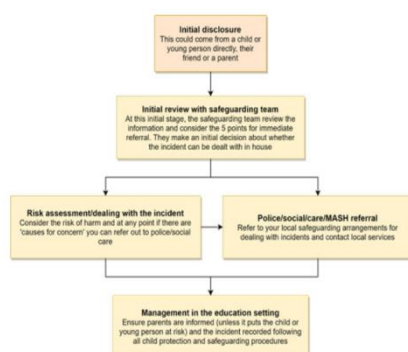
- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent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

## 10. Sharing of nudes and semi-nudes ('sexting')

### Your responsibilities when responding to an incident

When an incident involving nudes and semi-nudes comes to the attention of any member of staff in an education setting – use the following guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\) - GOV.UK](#)

- the incident should be referred to the DSL (or equivalent) as soon as possible
- the DSL (or equivalent) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process



## 11. Reporting systems for pupils

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

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Individual settings must share in a way that is easily understood by all pupils the reporting system covering:

- what it looks like for pupils in terms of who they should report concerns to
- How you make pupils aware of the reporting systems and processes, e.g. through discussion in your relationships/sex education curriculum
- How pupils will feel safe in submitting any concerns, e.g. reassurances provided following disclosures]

## 12. Online safety and the use of mobile technology

**12.1** Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. This includes meeting the DfE's Filtering and Monitoring and Digital and Technology Standards, including cyber security. Accordingly, the Trust and individual settings Online Safety Policies and associated Acceptable Use Policies are written in line with these standards, in addition to KCSIE (September 2025) 'Teaching Online Safety in Schools' 2023, statutory RSHE guidance 2025 and other relevant statutory and non-statutory guidance.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, all schools and settings must:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community



- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

## 12.2 The four key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

## 12.3 To meet our aims and address the risks above, individual schools will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of the Code of Conduct 6.2 Photograph, videos and other creative arts, and 6.3 Internet use and acceptable use of Trust technology.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

### 13. Artificial intelligence (AI)

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

HISP schools and Learning Partnerships recognise that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

HISP schools and Learning Partnerships will treat any use of AI to access harmful content or bully pupils or other adults in line with this policy and other applicable policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

### 14. Notifying parents or carers

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

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

If the DSL, in collaboration with the Head, identifies that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

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

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

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 15. Complaints and concerns about school safeguarding policies

HISP's complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action.

Complaints are managed by the Head, and governors, senior Trust staff and in exceptional circumstances, the CEO. Complaints from staff are dealt with under HISP complaints and disciplinary and grievance procedures.

**15.1 Complaints against staff** Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff

**15.2 Other complaints** Each local setting must have clear processes to regarding safeguarding-related complaints of other types, for example, those related to pupils or premises.

Early years providers should take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75).

**15.3 Whistle-blowing** Please refer to the HISP Whistleblowing policy.

## 16. Record-keeping

Records are held in line with the records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school (typically until the age of 25 or in line with local authority guidance – however, if records are linked to any ongoing investigations or significant incidents, they may need to be retained for longer periods.)

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

To allow the new school/college to have support in place when the child arrives, this should be within:

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

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

## 17. Training

### 17.1 All staff

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

Staff involved in the delivery of RSHE must receive regular safeguarding training specific to managing disclosures and teaching sensitive content (e.g. pornography, coercion, gender-based harm).

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the Trust-wide, whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners (a) the local authority (b) an integrated care board for an area any part of which falls within the local authority area (c) the chief officer of police for an area any part of which falls within the local authority area

- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

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

Staff will also receive regular safeguarding and child protection updates, including on online safety, at least once a half term (for example, through emails, e-bulletins and staff meetings).

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

Volunteers will receive appropriate training, if applicable.

### **17.2 The DSL and DDSLs**

- The DSL and DDSLs will undertake full child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

### **17.3 Trustees and Governors**

All trustees and governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of trustees or chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

### **17.4 Recruitment – One Trust [Safer and Inclusive Recruitment Policy – add link](#)**

HISP expects all senior leaders in schools to be Safer Recruitment trained. The panel members must be Safer Recruitment trained in the last two years. The Trust recommends the NSPCC Safer Recruitment Training.

### 17.5 Staff who have contact with pupils and families – Early Years Providers

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

## 18. Policy monitoring arrangements

Review of RSHE content and delivery will be part of school based annual safeguarding monitoring and DSL assurance activities. This will quality assured through the annual Trust safeguarding review.

This policy will be reviewed **annually**. At every review, it will be approved by the full Trust board.

## 19. Links with other policies

This policy links to the following setting specific or Trust policies and procedures:

<ul style="list-style-type: none"><li>• Behaviour</li><li>• Disciplinary</li><li>• Staff code of conduct</li><li>• Complaints</li><li>• Health and safety</li><li>• Attendance</li><li>• Online safety</li><li>• Mobile phone use</li></ul>	<ul style="list-style-type: none"><li>• Equality</li><li>• Relationships and sex education</li><li>• First aid</li><li>• Curriculum</li><li>• Privacy notices</li><li>• Whistle-blowing</li><li>• IT acceptable use</li><li>• One Trust Safer and Inclusive Recruitment Policy</li></ul>
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## Appendix A Key Contacts for Safeguarding at HISP

### 1.1 School-Specific Safeguarding Leads

School specific contacts, including the Heads and the Designated Safeguarding Leads (DSL) can be found at section 1.7 of this appendix.

### 1.2 Trust-Wide Safeguarding Leads

The Safeguarding Trustee, the Director of Safeguarding for HISP can be contacted using the details below:

**Safeguarding Trustee:** Jenny Hastings (Email: via - [k.lewis@hispmat.org](mailto:k.lewis@hispmat.org)) Phone number: 023 8254 1374 / 07956735095

### **Director of School Improvement and Safeguarding:**

Teresa Enriquez-Hayes Email: [t.enriquez-hayes@hispmat.org](mailto:t.enriquez-hayes@hispmat.org) Phone number: 07951 064556

### **1.3 Local Authority Integrated Multi-Agency Contacts**

When a professional working in Hampshire, Isle of Wight, Portsmouth, Southampton, or Bournemouth, Christchurch and Poole assesses that a child/family requires additional support, they need to complete an inter-agency referral or contact form as per local processes and share this with the relevant Multi-Agency Safeguarding Hub (MASH) or Children's Resource Centre (CRS).

If a professional believes that a child may be at risk of significant harm, they should both telephone the MASH/CRS (or out of hours children's services) and fill in an interagency form.

#### **Bournemouth, Christchurch and Poole (BCP)**

- MASH: [Inter-Agency Referral Form](#) (Out of hours: 01202 738256 )
- [LADO@bcpcouncil.gov.uk](mailto:LADO@bcpcouncil.gov.uk) 01202 817 600

#### **Hampshire**

- MASH: [0300 555 1384](#) (Out of hours: [0300 555 1373](#)) Professionals should complete the [Inter-Agency Referral Form \(IARF\)](#)
- [LADO service initial enquiry form- \(office.com\)/ LADO notification form.](#)

#### **Isle of Wight**

- MASH: Concern needs immediate action, call 01983 823435 (Out of hours: 0300 555 1373). Where immediate action is not needed professionals can use the referral form [Form Page - Inter-agency referral to Children's Services - Isle of Wight Council Form System](#)
- LADO service on (01983) 823435 or email [LADO@IOW.gov.uk](mailto:LADO@IOW.gov.uk) a referral form will be sent.

#### **Southampton**

- CRS: 02380 83 2300 (Out of hours: 02380 23 3344)
- LADO: [lado-notification-form-2024.doc](#) Phone: 023 8091 5535/ 07500 952 037 E-mail: [lado@southampton.gov.uk](mailto:lado@southampton.gov.uk)

### **1.4 Whistleblowing Officer**

The Trust [2024-05 Whistleblowing \(hispmat.org\)](#) Policy states that concerns should usually be reported to the Headteacher, Head of School, or Head of Organisational Unit.

If the concern involves one of these roles, report it to an Executive Headteacher or the Executive Director of Education.

- If it involves an **Executive Headteacher**, inform the **Executive Director of Education**.

- If it concerns the **Executive Director of Education**, report to the **CEO**.
- If it concerns the **CEO**, report to the **Chair of the Trust**.

### 1.5 Other contacts

- Professional Online Safety Helpline 0344 381 4772 or [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- NSPCC 0800 800 5000 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk) – 24-hour service.
- Childline 0800 1111 <https://www.childline.org.uk/>
- Police 111 or 999 in emergency

### 1.6 Safeguarding Adults

An adult at risk is defined as any person who is 18 and over, needs care or support, is experiencing, or is at risk of, abuse or neglect, and as a result of their needs is unable to protect themselves against the abuse or neglect. Contact details for the Safeguarding Adults Teams can be found below:

- BCP: 01202 123654 [asc.contactcentre@bcpcouncil.gov.uk](mailto:asc.contactcentre@bcpcouncil.gov.uk)
- Hampshire: 0300 555 1386 (out of hours 0300 555 1373)
- Isle of Wight: 01983 823340 [safeguardingconcerns@iow.gov.uk](mailto:safeguardingconcerns@iow.gov.uk)
- Southampton: 023 8083 3003 (out of hours 02380233344)



## 1.7 HISP School Safeguarding Contacts

School	Contact Number	Head	DSL	Safeguarding Governor
Portswood	023 8055 5885	Anthony Head (Headteacher) <a href="mailto:tony.head@portswoodpri.org.uk">tony.head@portswoodpri.org.uk</a>	Anna Adams <a href="mailto:anna.adams@portswoodpri.org.uk">anna.adams@portswoodpri.org.uk</a>	
Tanners Brook	023 8077 1659	Jess Paul (Executive Headteacher) <a href="mailto:j.paul@hispmat.org">j.paul@hispmat.org</a> Ingrid Dowse (Head of School) <a href="mailto:ingrid.dowse@tannersbrookpri.org.uk">ingrid.dowse@tannersbrookpri.org.uk</a>	Lisa Welch <a href="mailto:lisa.welch@tannersbrookpri.org.uk">lisa.welch@tannersbrookpri.org.uk</a>	
Carisbrooke College	01983 524651	Natalie Sheppard (Headteacher) <a href="mailto:natalie.sheppard@carisbrooke.iow.sch.uk">natalie.sheppard@carisbrooke.iow.sch.uk</a>	Michael Peake <a href="mailto:michael.peake@carisbrooke.iow.sch.uk">michael.peake@carisbrooke.iow.sch.uk</a>	
Crofton School	01329 664251	Simon Harrison (Headteacher) <a href="mailto:sharrison@croftonschool.co.uk">sharrison@croftonschool.co.uk</a>	Paul Williams <a href="mailto:pwilliams@croftonschool.co.uk">pwilliams@croftonschool.co.uk</a>	
Highcliffe School	01425 273381	Patrick Earnshaw (Headteacher) <a href="mailto:pearnshaw@highcliffeschool.com">pearnshaw@highcliffeschool.com</a>	Sarah Giller <a href="mailto:sgiller@highcliffeschool.com">sgiller@highcliffeschool.com</a>	
Medina College	01983 526523	Kam Bains (Headteacher) <a href="mailto:kam.bains@medina.iow.sch.uk">kam.bains@medina.iow.sch.uk</a>	Phil Pearce-Jones <a href="mailto:phil.pearce-jones@theislandviiform.org.uk">phil.pearce-jones@theislandviiform.org.uk</a>	
Danebury School	01264 810555	Nicky Goodridge (Headteacher) <a href="mailto:goodridgen@testvalley.hants.sch.uk">goodridgen@testvalley.hants.sch.uk</a>	Anna Collins <a href="mailto:collinsa@testvalley.hants.sch.uk">collinsa@testvalley.hants.sch.uk</a>	
Thornden School	023 8026 9722	Caroline Lowing (Headteacher) <a href="mailto:c.lowing@thornden.hants.sch.uk">c.lowing@thornden.hants.sch.uk</a>	Adam Thomas <a href="mailto:a.thomas@thornden.hants.sch.uk">a.thomas@thornden.hants.sch.uk</a>	

## 1.8 HISP Safeguarding Contacts

Partner	Contact Number	Lead & DSL
Inspiring Future Teachers	023 8024 6950	Helen Shaw (Director of Inspiring Future Teachers) <a href="mailto:h.shaw@hispmat.org">h.shaw@hispmat.org</a>
HISP Teaching School Hub		David Higginbottom (Deputy Director TSH) <a href="mailto:d.higginbottom@hispmat.org">d.higginbottom@hispmat.org</a>

## Appendix B Types of abuse

**Abuse and neglect** are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children 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 (including via the internet)

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

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

## Appendix C Specific safeguarding issues

### *Assessing adult-involved nude and semi-nude sharing incidents*

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

#### *Sexually motivated incidents*

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

### *Financially motivated incidents*

Financially motivated sexual extortion (often known as ‘sextortion’) is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person’s account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim’s bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

### *Children who are absent from education*

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing (unexplainable and/or persistent absences) from education, but some children are particularly at risk. These include children who:

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

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

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

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

### *Child criminal exploitation*

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work

in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### *Child sexual exploitation*

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

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

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### *Domestic abuse*

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

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

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

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

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

### *Homelessness*

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.



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

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

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

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

### *FGM*

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

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

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

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

### *Forced marriage*

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

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

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

If a member of staff suspects that a pupil is at risk of forced marriage, they should speak to the pupil in a secure and private setting, ensuring the pupil feels safe and supported. The concern must then be reported immediately to the Designated Safeguarding Lead (DSL).

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate
- Ensure that a Prevent risk assessment has been completed [Prevent duty: risk assessment templates - GOV.UK \(www.gov.uk\)](#)

### *Radicalisation – Extremism - Terrorism*

**Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence  
**Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

### *Checking the identity and suitability of visitors*

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will

carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

#### *Non-collection of children*

Each school will ensure that they have clearly communicated procedures and processes that will be followed If a child is not collected at the end of the session/day.

#### *Missing pupils*

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Each school will ensure that they have clearly communicated procedures and processes that will be followed If a child goes missing.

## Appendix D Children who may be more vulnerable to safeguarding risks

### *Pupils with SEND*

HISP recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Schools offer extra pastoral support for these pupils and must ensure that this is clearly communicated to all stakeholders.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

### *Pupils with a social worker*

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

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

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

- Responding to unauthorised absence or missing (unexplainable and/or persistent absences from education) education where there are known safeguarding risks
- The provision of pastoral and/or academic support

### *Looked-after, previously looked-after children, children in kinship care*

All schools will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

Each school has an appointed designated teacher who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after, previously looked-after, and kinship care children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after, previously looked-after, and kinship care children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

### *Pupils who are lesbian, gay, bisexual or gender questioning*

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See local setting behaviour policies for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerabilities. We will consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## Appendix E Child on Child Abuse and Harmful Sexual Behaviour Guidance

### Definition

Child-on-child abuse occurs when children abuse other children. This can happen both inside and outside of school, face-to-face or online, and may occur simultaneously across both.

We have a zero-tolerance approach to all forms of child-on-child abuse, including sexual violence and harassment, recognising that absence of reports does not indicate absence of incidents.

### *Forms of Child-on-Child Abuse*

Child-on-child abuse may include (but is not limited to):

- Bullying (including prejudice-based, discriminatory, and cyber-bullying)
- Abuse in intimate relationships between children
- Physical abuse (hitting, kicking, hair-pulling, etc.) — potentially with online elements
- Sexual violence (rape, assault by penetration, sexual assault — face-to-face or online)
- Sexual harassment (sexual comments, jokes, or online harassment)
- Causing someone to engage in sexual activity without consent
- Non-consensual and consensual sharing of nude/semi-nude images (“sexting”)
- Upskirting
- Initiation/hazing-type violence and rituals
- Online abuse (abusive messages, non-consensual image sharing, harassment)

### *Staff Responsibilities*

If a child discloses, or staff suspect, child-on-child abuse:

- Listen calmly, reassure, avoid judgment
- Avoid leading questions
- Record the disclosure factually in the child's words
- Inform the DSL/DDSL immediately
- Do not promise confidentiality

Staff must challenge inappropriate behaviours and make clear these are unacceptable and not a ‘normal part of growing up’.

### Victims of Sexual Violence and Harassment

Victims will:



- Be taken seriously, supported and protected
- Never be made to feel they're causing a problem by reporting abuse
- Be reassured that the law exists to protect them

Staff should be particularly alert to the increased vulnerability of:

- Girls
- Children with SEND
- LGBTQ+ children

### *DSL Response to Harmful Sexual Behaviour*

When responding, the DSL will:

- Safeguard all children involved
- Triage and record incidents using the Hackett Continuum
- Balance the victim's wishes against safeguarding duties
- Inform parents/carers appropriately (unless this increases risk)
- Refer to police or social care for serious cases
- Make and regularly review a risk and needs assessment
- Offer appropriate specialist support to all involved
- Record decisions, rationale and actions on CPOMS/MyConcerns

### **Police Involvement**

Where police are involved:

- Agree information sharing protocols with police
- Manage ongoing risk while investigations proceed
- Review risk assessments following outcomes
- Take disciplinary action where appropriate, without prejudicing investigations

### **Ongoing Support**

The DSL will:

- Support the victim to stay in school if they wish
- Offer internal and external specialist support
- Avoid isolating the victim unnecessarily
- Work with families to support alternative provision if preferred

For the child displaying harmful behaviour:

- Identify unmet needs and trauma
- Manage risks to other children
- Support access to education
- Put safeguarding management plans in place

## **Monitoring and Review**

The DSL will:

- Regularly review incidents to check processes have been followed
- Monitor for patterns of concerning behaviour
- Review policies and provide additional training if needed

## **Appendix F Elective Home Education (EHE)**

### **Elective Home Education (EHE)**

Whilst HISP recognises that many home educated children have an overwhelmingly positive learning experience, this is not the case for all. This can mean some children are less visible to services that are there to keep them safe and supported in line with their needs.

All staff will encourage parents to send their children to school to embrace the benefits of being a part of the HISP community, particularly those who are vulnerable. Under no circumstances will any school attempt to pressure or encourage a parent to home educate.

Where an application for EHE is made, the school will seek to meet with parents to determine whether the decision to home educate is in the best interests of the child. A summary of this meeting will be recorded on CPOMS/my concerns.

The school will also look to engage the Local Authority and other relevant agencies at the earliest opportunity to ensure that parents and carers have considered what is in the best interests of their child. This is particularly important where a child has SEND and/or a social worker and/or is otherwise vulnerable. Where a child has an EHCP, the local authority will need to review the plan, working closely with parents and carers.

If at any stage safeguarding concerns are identified, these will be referred to the Multi-Agency Safeguarding Hub without delay, in line with the procedures outlined above.

In any event, the Local Authority and the Trust will be informed of a parental request for EHE.

If a parent wants to admit their child to a school, the normal processes for in-year admissions applications will be followed.

The Headteacher will sign off on all elective home education

### *Allegations that may meet the harm threshold*

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

### **Suspension of the accused until the case is resolved**

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work within the Trust.

The case manager will inform the Director of Safeguarding, HR, and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

### **Definitions for outcomes of allegation investigations**

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps (with advice and guidance from the HISP Director of School Improvement and Safeguarding):

- Inform the Director of School Improvement and Safeguarding and HISP HR.
- Conduct basic enquiries in line with HISP procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the LADO. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether

alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate when completing the suspension/alternative duties risk assessment.

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the LADO. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Professional association support is encouraged alongside HISP provided support services.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- Early years providers will: Inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome
- The Head will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

### **Action following a criminal investigation or prosecution**

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

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school, in collaboration with the Director of School Improvement and Safeguarding, will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school, in collaboration with the Director of School Improvement and Safeguarding, will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

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

The case manager, in collaboration with the Director of School Improvement and Safeguarding, will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

### **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager, in collaboration with the Director of School Improvement and Safeguarding, will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension



- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## ***Section 2: concerns that do not meet the harm threshold***

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### ***Low-level concerns***

This appendix applies to any adult working in or on behalf of HISP; low-level concerns can be self-reported by and/ or shared about any adult.

#### **Definition**

A low-level concern is any concern — no matter how small — that an adult working with or for the school:

- May have acted in a way that breaches the staff Code of Conduct
- Behaved inappropriately, even if not harmful or criminal
- Created a sense of unease or 'nagging doubt'

Examples:

- Over-familiarity
- Inappropriate jokes or comments
- Favouritism
- Boundary-crossing behaviour

### Reporting Low-Level Concerns

- Report all concerns to the Headteacher/Head of Setting immediately.
- If about the Headteacher, report to the Executive Director of Education and Chair of Governors.
- Record concerns using CPOMS/MyConcerns or a Low-Level Concern Form.
- DSL and Headteacher to review patterns/trends regularly.

### Record Keeping

- Retain low-level concerns securely, separately from personnel files.
- Retain records in accordance with data protection and Trust policy.
- Review records for emerging patterns of behaviour.

If a potential low-level concern relates to a person employed by a supply agency or a contractor, that concern will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

### Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Trust/school's safeguarding system
- Ensuring that each school has a clear and simple way to report their concern to the Head

### *Reporting a potential low-level concern*

All staff must report any low-level concern about themselves or a colleague without delay.

1. Report to the Headteacher (or where the concern is about the Headteacher, report to the Trust DSL who will inform the Chair of Governors).
2. Reports should be made verbally as soon as possible, followed by a written record using the school's designated safeguarding system (e.g., CPOMS/MyConcerns) or a specific low-level concern form (follow your settings guidance).

### *Initial response to a potential low-level concern*

Once the Headteacher/Head of Setting has received what is believed (by the person raising it) to be a low-level concern, they should (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- (a) speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- (b) speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- (c) speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- (d) review the information and determine whether:
  - (i) the behaviour is appropriate – ie entirely consistent with their staff code of conduct and the law,
  - (ii) the behaviour constitutes a low-level concern,
  - (iii) there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact may meet the harm threshold, in which case they should consult with their LADO,
  - (iv) in and of itself the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies, or
  - (v) when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold, and should be referred to the LADO/other relevant external agencies
- (e) make appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
  - all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis);
  - their determination (as above at (d));
  - the rationale for their decision; and
- any action taken.

*Response to a potential low-level concern – If it is determined that the behaviour is **entirely consistent with the organisation’s staff code of conduct and the law**:*

(a)it will still be important for the Headteacher/Head of Setting to update the individual in question and inform them of the action taken as above;

(b)in addition, the Headteacher/Head of Setting should speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation’s staff code of conduct and the law;

(c)such a situation may indicate that:

- the staff code of conduct is not clear;
- the briefing and/or training has not been satisfactory; and/or
- the low-level concerns policy is not clear enough.

If the same or a similar low-level concern is subsequently shared by the same individual, and the behaviour in question is also consistent with the staff code of conduct, then an issue may need to be addressed about how the subject of the concern’s behaviour is being perceived, if not about the behaviour itself, and/or the organisation may need to look at the implementation of its low-level concerns policy

*Response to a potential low-level concern – If it is determined that the behaviour **constitutes a low-level concern***

(a)any investigation of low-level concerns should be done discreetly and on a need-to-know basis;

(b)most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;

(c) in many cases, a low-level concern will simply require a conversation **and an email follow up** with the individual about whom the concern has been raised.

(d) presentations as a 'values-based conversation' is more likely to be effective, and help maintain a positive professional relationship with the member of staff concerned. Leaders should use an approach that is characterised by a spirit of genuine enquiry. For example, "I am sure you subscribe to our organisational values, so help me understand how you came to behave in a way which is not in keeping with those, so that we can understand what actions or support you might need so that we can both be confident that it will not happen again...;"

(e) any such conversation should include being clear with the individual as to why their behaviour is inappropriate, problematic or concerning, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate. This should be followed up with a helpful letter.

(f) some low-level concerns may also raise issues of misconduct or poor performance which are unrelated to safeguarding. The Headteacher/Head of Setting should also consider whether this is the case – by referring to the organisation's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary. If the Headteacher/Head of Setting considers that the organisation's disciplinary or capability procedure may be triggered by the low-level concern(s) shared, they should refer the matter to HR. Any such referral should be made by the Headteacher/Head of Setting having received the low-level concern and not by individual staff members. Equally, it is essential that there is close liaison and appropriate information sharing between the Headteacher/Head of Setting and HR, so that a holistic view of the individual can be taken. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR;

(g) where low-level concerns do trigger HISP's disciplinary, capability, grievance, whistleblowing or other procedures, these procedures will be followed where appropriate. Where low-level concerns are raised which engage other procedures, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow; HISP will exercise professional judgement and, if in any doubt, will seek advice from HR and other relevant external agencies including the LADO

Staff will be trained to understand that when they share what they believe to be a low-level concern, the Headteacher/Head of Setting will speak to the adult who is the subject of that concern – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records, which may need to be referenced in any subsequent disciplinary proceedings.

*Response to a potential low-level concern – If it is determined that the behaviour (iv) in and of itself may meet the harm threshold, or (v) when considered with any other low-level concerns that have previously been shared about the same individual, **may meet the harm threshold***

- (a) it should be referred to the LADO/ other relevant external agencies, the Trust DSL informed, and in accordance with the organisation's safeguarding policy or, if separate, managing allegations against staff policy, and Part 4 of KCSIE
- (b) all organisations (including schools and colleges in England) are, in any event, required to comply – in all matters relating to safeguarding – with the relevant procedures and practice guidance stipulated by their Local Safeguarding Partnership.

### *Record keeping*

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Appendix H Single Central Record

Each school will maintain a Single Central Record (SCR) of all school employees, agency staff, volunteers (including governors), contractors and any others involved in regulated activity (including Alternative Provision).

The SCR will be overseen and directly managed by the Head with the support of the DSL, who is responsible for safeguarding in the school. It is the responsibility of the HR Administrator/ equivalent within the school to maintain the information on the SCR.

Audits will be conducted half-termly, by the Designated Safeguarding Lead and Head alternately.

The Safeguarding Link Governor must undertake a formal SCR check alongside the DSL and/or Headteacher at least termly and record findings in governor monitoring records.

The details of an individual should be removed from the SCR once they no longer work for the school and/or Trust.

A SCR will be maintained centrally for all Trust-wide members of staff, Directors, and Trustees. This will be shared with all HISP schools as and when it is updated.

Statutory requirements as outlined in KCSiE 2024 will be met:

- the SCR covers all staff, even if they only work for one day – for academies and free schools, this includes the members and trustees of the academy trust
- for agency and third-party staff, the SCR records:
  - whether the school has received written confirmation that the employment business supplying the member of staff has carried out the relevant checks and obtained the appropriate certificates
  - the date the school this confirmation was provided
  - whether details of any enhanced DBS certificate have been provided in respect of the member of staff
- for all remaining staff (including teacher trainees on salaried routes), the SCR must record whether the following checks have been carried out (or certificates obtained). These include:
  - an identity check
  - a standalone children's barred list check
  - an enhanced DBS check (with children's barred list check) requested/certificate provided
  - a prohibition from teaching check
  - further checks on people who have lived or worked outside the UK

- a check of professional qualifications, where required
- a check to establish the person’s right to work in the UK
- for academies and free schools, if the section 128 checks have been carried out for those in management positions
- the SCR indicates the date when each check listed above was completed (or certificate obtained)

### **Process for Escalating Safeguarding Concerns**

If during a monitoring visit, review of documentation, or SCR check the Trust DSL or Link Governor identifies a safeguarding concern, the following process must be followed:

<b>Step</b>	<b>Action</b>	<b>Responsible</b>	<b>Timescale</b>
1	Raise the concern immediately with the Headteacher and DSL.	Trust DSL/Link Governor	Same day
2	Record the concern and agreed actions in the Governor Monitoring Visit Record.	Trust DSL/Link Governor	Same day
3	If unresolved or of a serious nature (e.g. SCR non-compliance or risk to child safety), escalate to the Trust DSL and Chair of Governors.	Trust DSL/Link Governor	Within 24 hours
4	The Headteacher must respond in writing to the Link Governor and Chair of Governors/Trust DSL within <b>48 hours</b> , detailing the action taken or planned.	Headteacher	Within 48 hours
5	The issue and response should be formally logged and presented at the next full AC/Trust Board meeting.	Clerk to Governors	At next scheduled meeting
6	If unresolved or if the concern relates to the Headteacher, escalate via the Trust DSL.	Trust DSL.	Immediately, within same working day

**Each Executive Headteacher, Headteacher, Head of School, Inspiring Future Teachers lead, and Teaching School Hub lead retains accountability for their Single Central Record (SCR). The Trust is responsible for quality assuring this.**



## Appendix I. Record keeping and File Transfer

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

When a child has made a disclosure, the member of staff/volunteer should;

- record it as soon as possible after the conversation, using CPOMS/ my concerns
- not destroy the original notes in case they are needed by a court (this includes notes taken by the member of staff);
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- use a CPOMS/my concerns body map to indicate the position of any injuries if relevant; and
- record verbatim statements and observations within records, rather than interpretations or assumptions

All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

Records will 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.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with the records retention schedule.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. The transfer will take place as soon as possible, and within 5 days for an in-year transfer and within 5 days of the start of a new term. Confirmation of receipt will be obtained. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

When receiving child protection files for new pupils, schools will ensure that key staff (such as the DSL and SENDCO) are aware, as required.

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 is in place to protect the personal information of individuals. It does not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe should be shared so that informed decisions can be made about a child's welfare.

We have a duty of care for our pupils and safeguarding is the priority. GDPR does not 'trump' safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which HISP is subject. Therefore, consent is not needed for the effective sharing of safeguarding information between a school and relevant authorities.

Upon receipt of any request regarding direct access to school documentation on a Child Protection file, the Head and DSL will be informed, and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.

Any external individual or organisation contracted by a school to work with their pupils must report any child protection incidents or disclosures from pupils to the Head or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the school, be required to work in accordance with the Trust's child protection and safeguarding policy.

## Appendix J Additional Information

### Use of physical interventions

Detailed guidance is available in the Trust's Code of Conduct Section 5.4, which all colleagues are expected to follow.

### Early years settings within schools

As an early year's provider delivering the Early Years Foundation Stage (EYFS), all HISP primary schools aim to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance <https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

All HISP Primary schools will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing;

- a safe secure learning environment;
- a member of staff who holds a current, paediatric first aid certificate is available on the premises at all times, and accompanies children on school trips;

- a designated key worker who liaises with parents and carers;
- routine monitoring of health and safety practices, to promote children's safety and welfare;
- appropriate staffing, ratios and qualifications comply with statutory guidance and can meet the needs of all children;
- an environment where children can be seen and heard at all times;
- a member of staff responsible for leading on safeguarding within the early years; and
- training and development for all staff so they are able to take appropriate action where there are safeguarding or child protection concerns.

### Safeguarding Adults at Risk

HISP recognises its legal and moral responsibility to safeguard adults at risk of abuse or neglect in their care; we take proactive steps to create safe and supportive environments for vulnerable adults.

Adults at risk include any adult who:

- A) has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- B) is experiencing, or at risk of, abuse or neglect, and;
- C) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The Care Act (2014) identifies the following categories of adult abuse and harm:

- Physical
- Sexual
- Emotional/Psychological
- Neglect and acts of omission
- Financial or material abuse
- Discrimination
- Organisations/institutional abuse
- Domestic abuse (including coercive control)
- Modern slavery

When supporting adults at risk, the Trust will act in line with the following principles as set out in the Care Act (2014):

- Empowerment – Empowering adults at risk to make their own choices and decisions, have control over their lives, and participate actively in decisions that affect them.
- Prevention – It is better to take action before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented.
- Protection – Support and representation for those in greatest need.

- Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- Accountability – Accountability and transparency in delivering safeguarding.

If any member of the Trust community has a concern about the safety or welfare of an adult at risk, this should be reported to a DSL or DDSL immediately. Where the subject of the concern is a pupil (e.g., in Sixth Form), or has links to a current pupil, the concern should be logged on CPOMS/my concerns. In all other cases, staff should speak to the DSL/DDSL for advice.

When responding to concerns about adults at risk, DSLs/DDSLs will be guided by the principles above and will seek advice from Adult Social Care (see Section 1.8).

### The role of the DSL

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

Please see below for a non-exhaustive list:

The DSL will:

- keep the headteacher informed of any issues;
- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- provide oversight, support and challenge to DDSLs;
- act as a point of contact with the safeguarding partners and engaging fully with requests for information (e.g., Section 175 audit);
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- have a good understanding of harmful sexual behaviour
- have a good understanding of the filtering and monitoring systems and processes in their school/area;
- where the DSL is the Prevent lead: Make sure that staff have appropriate Prevent training and induction;
- Where the DSL is a lead practitioner for the local authority: Act as a lead practitioner for the local authority;
- liaise with local authority case managers and designated officers for child protection concerns as appropriate;
- discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search;
- identify if children may benefit from early help;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- support their school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- refer cases to the police where a crime may have been committed;
- be available during school hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- undertake training to equip them with the skills to carry out the role and update this every two years;
- maintain a forensic understanding of safeguarding data, including data relating to child on child abuse;
- ensure all staff that work directly with children have read and understood Part 1 and Annex B of KCSIE (September 2024);
- ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of KCSIE (2024);
- update their knowledge and skills regularly and keep up with any developments relevant to their role;
- provide staff in their school with the knowledge, skills and support required to safeguard children;
- ensure that all staff in their school receive initial training and appropriate regular update training via whole staff training or bulletins on safeguarding, including how to recognise the signs and symptoms of abuse. This includes provision of training on how to report a safeguarding concern through the school's CPOMS/my concerns safeguarding recording system.
- ensure that all staff have an understanding of child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities or those who identify as LGBTQ+
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- take responsibility for the transfer of safeguarding files when a child leaves their school;
- monitor school mobility, and in particular take responsibility for those children removed from the school to ensure adherence is in line with LA and Trust guidance and that all reasonable steps are taken to ensure that the child is safe;

- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- ensure that parents and carers are informed of the safeguarding procedures through access to the policy and procedures on the school website and reminders via newsletters;
- work closely with other relevant education professionals (e.g., SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team;
- promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child;
- meet regularly with the safeguarding link governor and/or Chair of Governors to review safeguarding at their school;
- meet regularly with relevant curriculum leads to share information about emerging trends and ensure that the safeguarding curriculum is meeting the needs of pupils;
- meet regularly with the school Business Manager/HR to ensure that safe recruitment practices are in place and effective, including checking that the school's Single Central Record is maintained in line with statutory guidance;
- contribute to safeguarding quality assurance activities;
- liaise with the headteacher regarding safeguarding cases

### *Strip Searches and Appropriate Adults*

*The following information is taken from the DfE guidance on Searching, Screening and Confiscation (2022) and the Police and Criminal Evidence Act.*

### **Strip Searches**

A strip search is a search involving the removal of more than outer clothing. Strip searches on school premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C.

While the decision to undertake the strip search itself and its conduct are police matters, staff retain a duty of care to the pupils involved and should advocate for pupil wellbeing at all times.

**Staff are not permitted to conduct strip searches on pupils.**

Before calling police into school, staff should assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing and the risk of not recovering the suspected item. Staff should consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other

appropriate, less invasive approaches have been exhausted. Once the police are on school premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school is to advocate for the safety and wellbeing of the pupil(s) involved.

Unless there is an immediate risk of harm and where reasonably possible, staff should inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents should always be informed by a staff member once a strip search has taken place. Schools should keep records of strip searches that have been conducted on school premises and monitor them for any trends that emerge.

Except in cases of urgency where there is risk of serious harm to the pupil or others, whenever a strip search involves exposure of intimate body parts there must be at least two people present other than the pupil, one of which must be the appropriate adult (see below). If the pupil's parent would like to be the appropriate adult, the school should facilitate this where possible. Police officers carrying out the search must be of the same sex as the pupil being searched. An appropriate adult not of the same sex as the pupil being searched may be present if specifically requested by the pupil. Otherwise, no-one of a different sex to the pupil being searched is permitted to be present, and the search must not be carried out in a location where the pupil could be seen by anyone else.

Except in urgent cases as above, a search of a pupil may take place without an appropriate adult only if the pupil explicitly states in the presence of an appropriate adult that they do not want an appropriate adult to be present during the search, and the appropriate adult agrees. A record should be made of the pupil's decision and signed by the appropriate adult. The presence of more than two people, other than an appropriate adult, shall be permitted only in the most exceptional circumstances.

Strip searching can be highly distressing for the pupil involved, as well as for staff and other pupils affected, especially if undertaken on school premises. PACE Code C states that a strip search may take place only if it is considered necessary to remove an item related to a criminal offence, and the officer reasonably considers the pupil might have concealed such an item. Strip searches should not be routinely carried out if there is no reason to consider that such items are concealed.

Pupils will be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a police matter, but should always be accompanied by a safeguarding process handled by the school which gives attention to the pupil's wellbeing and involves the DSL/DDSL. Safeguarding should also be at the centre of support following a strip search in which the item is not found, both in the sense of supporting the pupil to deal with the experience of being searched, and regarding wider issues that may have informed the decision

to conduct a strip search in the first place. In both cases, pupils should feel that they have an opportunity to express their views regarding the strip search and the events surrounding it. School staff should give particular consideration to any pupils who have been strip searched more than once and/or groups of pupils who are more likely to be subjected to strip searching with unusual frequency, and consider preventative approaches.

### **Appropriate Adults**

The Police and Criminal Evidence Act (1984) PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The DSL (or DDSL) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS/my concerns. If having been informed of the vulnerabilities, the DSL or DDSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

#### **The ‘appropriate adult’ means, in the case of a child:**

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
  - a. a police officer;
  - b. employed by the police;
  - c. under the direction or control of the chief officer of a police force; or
  - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer’s functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>



## Appendix K HISP Safeguarding and Child Protection Policy – Summary of Key Information

### **General Principles – All staff must:**

- Understand that safeguarding is everyone's responsibility and ensure that their conduct is child centred and in line with the code of conduct and IT acceptable use policies.
- Be able to identify communicate effectively with the Designated Safeguarding Lead (DSL) and Deputy DSLs.
- Be alert to signs of abuse and neglect and report and record concerns in line with this policy.
- Read Part 1 and Annex B of Keeping Children Safe in Education and undertake annual safeguarding training.
- Understand the contextual safeguarding concerns identified by their school and strategies to support pupils.

### **Responding to and Recording Concerns**

- If a child discloses abuse, or is at imminent risk of harm, this must be reported immediately and in person to a DSL or DDSL. Staff should explain to the child what action they plan to take, including who will be informed.
- When handling disclosures, staff should remain professional, provide their full attention, and listen carefully to the child. Staff should reassure the child, and must not judge or blame, ask leading questions or promise confidentiality. Children making disclosures of abuse should not be asked to write down their disclosure.
- Any concerns for a child's safety or welfare must be recorded on CPOMS/my concerns under the category of 'Safeguarding Concern' before the end of the school day. Urgent concerns, or disclosures of abuse, must be reported immediately.
- Records should be made as soon as possible after a concern arises. Staff must not destroy original notes as these may be required as evidence in court.
- Records should be made in a timely manner. They should be professional, objective, succinct, accurate and child centred. They should not include interpretations or assumptions.
- All incidents of physical intervention (use of reasonable force) must be logged on CPOMS/my concerns.

### **Specific Concerns – All staff must:**

- Consider whether children are at risk of abuse or exploitation in situations outside of their families (extra-familial harm), reporting and recording any concerns that arise.
- Report disclosures of Female Genital Mutilation to the DSL and to the Police. The DSL will support staff to report incidents to the police.
- Be aware of the Prevent Duty and have due regard to the need to prevent people from being drawn into terrorism. All staff should promote the fundamental British Values.

- Have a basic understanding about how filtering and monitoring is used within school to keep children safe online. Concerns relating to online safety should be logged on CPOMS/my concerns.
- Be aware that children can abuse other children (child on child abuse) inside or outside of the school and respond with the same rigour as they would for incidents involving adults.
- Adopt a zero-tolerance approach to sexual violence and sexual harassment. Staff should adopt an attitude of “it could happen here” and must never dismiss incidents as “banter”. Staff must understand the meaning of “consent” and ensure that incidents of sexual violence and sexual harassment are challenged, recorded and reported immediately.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be aware that trauma and adversity can have a lasting impact on a child’s mental health, behaviour, attendance and progress at school. Concerns about a child’s mental health should be recorded on CPOMS/my concerns. under the ‘Safeguarding’ category.

#### *Appendix L Briefing sheet for temporary and supply staff*

For supply staff and those on short contracts in HISP schools

While working in our school, you have a duty of care towards the children and young people here. This means that at all times you should act in a way that is consistent with their safety and welfare. In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL).

This is not an exhaustive list but you may have become concerned as a result of:

- Observing a physical injury, which you think may have been non-accidental.
- Observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for.
- Observing child behaviour that leads you to be concerned about a child or young person.
- A child or young person telling you that they have been subjected to some form of abuse
- Observing adult behaviour that leads you to be concerned about their suitability to work with children or young people.

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL as soon as possible – the same day of the disclosure. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish.
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect.
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it and give your record to the DSL who should follow due process, including contacting Children's Social Care if appropriate.

Remember, if you have a concern, report it.

### **As part of HISP, Inspiring Future Teachers adopt the HISP Trust Safeguarding and Child Protection policy.**

The HISP Safeguarding and Child Protection Policy outlines in detail the definitions, responsibilities and processes for managing any safeguarding concerns, including allegations of abuse, made against an adult working in a school as part of the IFT partnership. This appendix intends to summarise the management of concerns specifically related to trainee teachers and should be read in conjunction with the main policy.

#### **Definitions:**

- An allegation of abuse is defined as any case in which it is alleged that an adult has behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates they would 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.
- A low-level concern is defined as a concern relating to behaviour that is inconsistent with the SCITT's policies, such as Code of Conduct, but does not meet the threshold for an allegation of abuse, as outlined above.

#### **Key Principles:**

- At all times, IFT will work in full accordance with the statutory guidelines set out within the relevant section of DfE statutory safeguarding guidance, as well as with local guidelines issued by the relevant Local Authority.
- Trainees will be issued with relevant documentation pertaining to professional expectations (e.g. Code of Conduct & Acceptable Use of ICT Policy, IFT Learning Agreement) as well as policies for the school/s in which they are based so that they understand and are trained to implement safe working practice with children.
- Any concern about a Trainee, whether that is a low-level concern or one meeting the threshold to be considered an allegation of abuse, will first be reported to the Headteacher of the school where the trainee is based. Exceptionally, in the Headteacher's absence, the report may be made to the next senior member of staff who is acting as the Headteacher in their place.
- Upon receipt of a low-level concern or allegation, the Headteacher will take timely and appropriate action to respond to this in line with statutory guidance and the HISP Trust

safeguarding and child protection policy, following the relevant process pertaining to the level of concern. Where required, for a concern indicating an allegation of abuse, this may include a referral to the Local Authority Designated Officer (LADO).

- The Headteacher will also inform the IFT Hub Lead, who will liaise with the IFT Director/DSL, and they will work with them to support and oversee the response to the concern. They will jointly agree to any amendments or changes to the trainee's placement, such as suspension or transfer (see below).
- The Headteacher and the IFT Hub Lead will keep a written record of all actions taken to address the concern, as per the main policy.
- If the concern also necessitates the involvement of a relevant HR policy in order to reach a resolution, such as disciplinary, the IFT Cause for Concern Procedures will be followed.
- In the event of two or more concerns being logged for the same trainee, the Headteacher and National ITT Lead together will review any emerging pattern of concern to identify any required areas of additional support, training and guidance for the trainee, in line with the IFT Support Plan Procedure.

**Additionally:**

- **Aims and Values**

IFT is committed to the safeguarding and welfare of children. Staff, trainees and partners (including trainers, mentors and professional tutors) are expected to share this commitment. All children have a fundamental right to be protected from harm and to have access to an educational environment in which they feel safe and secure. Safeguarding concerns are expected to be handled sensitively and professionally, and always with the health and safety and the needs of the child as the focus. The aim of this IFT policy is to ensure that staff, trainees and partners are aware of the responsibilities towards safeguarding and can act with clear direction and with knowledge of good practice and procedures.

## **2. Core principles**

The core principles of this policy are:

- the welfare of children is paramount
- to provide a learning environment for children which is safe and secure
- to teach children how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm
- children and young people have a right to be treated with respect and dignity, as do the adults who work with them

- it is the responsibility of all adults to safeguard and promote the welfare of children and young people
- to recognise that all children may be vulnerable to abuse, but be aware that some children have increased vulnerabilities due to special educational needs or disabilities
- to maintain a robust recording system for any safeguarding or child protection information
- all children and young people must have the opportunity to express their views about decisions taken about their lives
- to create and embed a culture of openness, trust and transparency in which IFT's values and expected behaviours, set out in the code of conduct are lived, monitored and reinforced constantly by all partners.

### **3.Recruitment of Trainees**

Before commencing the IFT training programme, IFT will undertake DBS Enhanced Disclosures and Prohibition for Teaching for all trainees to ensure compliance with DfE requirements. For salaried trainees, these checks are completed by the employing school.

A record of all checks on trainees will be held on the Single Central Record. A satisfactory check is defined as having no criminal convictions (including cautions, reprimands and final warnings) that might impact on undertaking the role of a trainee teacher. Overseas police checks will be carried out for those who have lived outside the UK for six months or more within the last five years, in line with Keeping Children Safe in Education (2024) and the ITT Criteria and Supporting Guidance ([Initial teacher training \(ITT\): criteria and supporting advice, academic year 2024-25 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Initial_teacher_training_ITT_criteria_and_supporting_advice_academic_year_2024-25.pdf))

All registered trainees must report any subsequent criminal convictions to the ITT Hub Lead. (who will inform the IFT policy and compliance lead). Failure to do so will result in disciplinary action being taken. It is the responsibility of the trainee to complete the DBS application correctly. Where a DBS certificate shows a conviction, caution, reprimand or final warning, the ITT Hub Lead will liaise with the placement school Headteacher who will refer it to the Director of IFT. The Director of IFT will liaise with HISP's Accounting Officer who will have the final decision on satisfactory DBS checks.

If evidence comes to light where convictions or safeguarding concerns have been withheld, the IFT Hub Lead, in conjunction with the IFT Director and the IFT Policy and Compliance Lead, will investigate the evidence and make a decision as to the trainee's placement on the Programme.

This may lead to their place being terminated and the trainee withdrawn on the basis of the trainee having withheld information related to criminal convictions.

If the application discloses a criminal conviction, then this is dealt with at the interview stage. The IFT Central Board will decide with the Director of IFT, the Director of School Improvement and Safeguarding, the Executive Director of People, and the Accounting Officer if this is a barrier to the programme.

If the DBS shows convictions, offences, cautions or warnings then these will be discussed with the HISP Executive Director of People to establish an appropriate understanding of what poses a barrier for commencing the programme.

Candidates who are unsuited to working with children may not have any previous convictions, and providers should be vigilant during the selection process. Providers or employing schools have a duty to ensure that trainees are properly managed and supervised and that, if they have concerns, information is referred to the police and the DBS.

Candidates who have lived or worked outside the UK must undergo the same checks as all other staff in schools and colleges. In addition, further checks should be carried out so that events that occurred outside the UK can be considered. The Home Office has published guidance on criminal record checks for overseas applicants.

Providers and employers must check that candidates are not:

- subject to a prohibition order issued by the Secretary of State
- prohibited to teach in another country of the European Economic Area (EEA)

The list of prohibited teachers is on the Teacher Services system.

Our staff recruitment policies and practices are rigorous and comply with safe recruitment and selection requirements. We always pursue identity checks and qualification checks, and we take up and scrutinise written references.

- Identity checks must be carried out on all conditional offers made before the commencement of training
- IFT completes online searches as part of their due diligence checks on applications.
- All successful applicants will have an enhanced DBS check before starting the programme.
- All trainees should wear their placement school ID badge when on placement.
- The trainee should bring in their original DBS certificate to the IFT Hub Lead, this is noted on their SCR, which is accessible to the central IFT Team.

- All trainees will receive Child Protection, Safeguarding and Prevent training during their training. This includes online units from the National College as part of induction with completion certificates are uploaded to Mosaic.
- Trainees also participate in school level training.
- All placement schools must make their Safeguarding, Child Protection policies and Code of Conduct available to the trainee and induct them on the policies and procedures. These must be adhered to by the trainee.
- Trainees need to follow the placement school's policy on taking photographs of children. Personal cameras, personal mobile phones or other personal devices should not be used to take photographs of pupils
- All trainees are to sign a register when attending centre-based and subject/phase-based training

#### **4. Training and Development**

For IFT staff and trainees to be able to understand and discharge their safeguarding and child protection duties, IFT will ensure all trainees carry out safeguarding training in their placement school as well as in their centre-based training. We will also ensure all IFT staff and trainees are up to date with safeguarding procedures and national initiatives and all trainees have read, understood and signed the IFT specific contract.

#### **5. Reporting concerns**

If a member of IFT staff is visiting a school and receives a disclosure from a member of the school community or notices anything of concern, they will follow the school's safeguarding procedures for reporting and referring.

#### **6. Allegations against IFT trainees or staff**

IFT recognises there are situations where it is possible for trainees or staff to conduct themselves in a manner that may be deemed to be causing harm to children and takes any allegation seriously. IFT is guided by local procedures for managing allegations against staff or trainees.

If a concern is raised about a member of IFT staff, this should be referred to Director of IFT.

If a concern is raised about the Director of IFT it should be referred to the Executive Director of Education.



Allegations against staff will follow the employing school's or HISP safeguarding and child protection policies and disciplinary procedures.

If a concern is raised about a trainee on the IFT course, the ITT Hub Lead for that course must be informed immediately.

### **6.1 Low-level concerns**

'Low-level' concerns are those that are deemed not to have met the harm threshold as set out in KCSIE 2024. 'Low-level' does not mean that it is insignificant. Low-level concerns could include a trainee who is inconsistent with the staff code of conduct, has favourites within the classroom or takes photos of children on their mobile phone, contrary to the school policy. This is not an exhaustive list, and low-level concerns may arise in several ways and from several sources.

All low-level concerns should be referred to the ITT Hub Lead. The school's Lead Mentor and the ITT Hub Lead will have a formal, recorded conversation with the trainee about the concern and clearly explain the correct procedures that should be followed. If it is appropriate, they may be placed on a Cause for Concern that relates to Part 2 of the Teachers' Standards. The Cause for Concern procedures are documented in the Course Handbook. All low-level concerns are reported to the Executive Partnership Board of IFT.

All low-level concerns should be recorded in writing, including the details of the concern, the context in which the concern arose, and the action taken. The record will be saved in the trainee's electronic, password protected folder. As per the GDPR policy, trainees' files are saved for seven years following their completion, withdrawal or suspension from the course. Low-level concerns will only be used in references if they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

### **6.2 Concerns or allegations that meet the harm threshold**

Allegations that meet the harm threshold are defined in KCSIE 2024 as being where any person who works in a school or college that provides education for children under 18 years of age, has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In the event of an allegation against an IFT staff member, the HISP safeguarding policy will be followed. In the event of an allegation against a trainee that meets the threshold, the placement school must follow their school's safeguarding policy, including looking after the welfare of the child and investigating and supporting the person subject to the allegation. The placement school must also inform the IFT Hub Lead - Director of IFT immediately. The placement school or the IFT Hub Lead may ask the trainee to leave the school premises immediately, temporarily pausing the placement, while investigations are conducted. The Director of School Improvement and Safeguarding, Teresa Enriquez-Hayes ([t.enriquez-hayes@hispmat.org](mailto:t.enriquez-hayes@hispmat.org)) must be made aware of the investigation by the IFT Director.

The Headteacher of the placement school in collaboration with the IFT Hub Lead and Director of IFT will inform the Local Authority Designated Officer (LADO). When dealing with allegations, the placement school and IFT should:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently,
- provide effective protection for the child and support the person subject to the allegation.

Following investigation by the LADO that leads to no further action, the Director of IFT and LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerns and by whom.

Where further enquiries are required, the trainee may be suspended\* (\*Suspension may include a withdrawal from or failure of the course) from the course, following advice from the LADO. The Director of IFT will record the rationale and justification for such a course of action, writing to the trainee to inform them of the decision within one working day. DfE Register will be updated by the IFT administrators. The process for allegations that meet the harm threshold, as set out in KCSIE 2024 will be followed.

Records of the allegation which are found to be malicious or false will be removed from the trainee's records unless they give consent for retention of the information. For all other allegations (substantiated, unfounded and unsubstantiated), a record of will be kept securely in a password protected folder until the trainee has reached normal pension age or for a period of 10 years from the date of the allegation. The record will include:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved

- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

All trainee records will be kept in accordance with all applicable data protection legislation. Trainee records will be maintained according to the Hub organisation's data policies and retention schedules, with coordination between the Hub and IFT to ensure records are available, accurate, and securely stored.

If a trainee is removed from the programme because they have harmed or pose a risk of harm to children, or if IFT, as the accredited ITT provider, would have removed the trainee had they not left, the Director of IFT (in collaboration with the IFT Hub Lead, the Director of School Improvement and Safeguarding) will seek guidance from DBS and inform DfE by contacting [itt.safeguarding@education.gov.uk](mailto:itt.safeguarding@education.gov.uk)

### **6.3 Reporting safeguarding concerns about an IFT trainee flowchart**

