

Trust Safeguarding And Child Protection Policy

Date of Approval:	July 2026
Approved by:	Trust Board
Review Date:	July 2027

Policy Information:

Date of last review	New Policy	Review period	Annually
Date approved	September 2026	Approved by	FET Board
Policy Owner	Trust DSL Trust Safeguarding & Attendance Lead	Date of next review	July 2027

Updates made since the last review:

Review Date	Changes made	By whom
NB: Individual school policies have been replaced by a trust-wide policy, with setting-specific contextualisation to reflect local circumstances.	New trust policy.	Trust DSL Trust Safeguarding & Attendance Lead

Safeguarding Arrangements at Trust level

(School-level versions of this policy include the names and contact details of the school's designated safeguarding personnel).

Name	Position	Role	Training details
Leanne Mahony	Director of Education	Trust DSL	DSL Refresher on Safeguarding & Child Protection - June 2026
Cavelle Burris	Trust Safeguarding & Attendance Lead	Deputy Trust DSL	DSL Refresher on Safeguarding & Child Protection – Nov 2024

Local Safeguarding Arrangements & SEND Cohort Profile

Further information can be found within each school's individual policies, available on their respective websites.

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Introduction & Purpose

We are committed to safeguarding children and expect all staff and visitors to the Trust and all schools to share this commitment. We will always act in the best interest of the child.

The Trust and its schools aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of, and fully understand, their statutory responsibilities with respect to safeguarding.
- Staff are effectively trained in recognising and reporting safeguarding issues as part of our culture of vigilance.
- A whole school approach to safeguarding (i.e., safeguarding culture) is clear and that safeguarding underpins all relevant systems and processes with a continuing commitment and ongoing vigilance. This culture includes listening to children and taking account of their wishes.

'Keeping Children Safe in Education' (KCSIE) is statutory guidance for schools and colleges and sets out the legal duties with which they must comply. This guidance is updated annually and must be read and understood by all staff, Academy Community Council members, and Trustees.

All schools are recognised as relevant partners within local safeguarding arrangements and are required to work in partnership with the local authority and other safeguarding agencies in line with Working Together to Safeguard Children (2026).

Under Section 11 of the Children Act 2004, a range of organisations and individuals are required to ensure that their functions are carried out with regard to safeguarding and promoting the welfare of children. Whilst Multi-Academy Trusts (MATs) are not explicitly named within this legislation, schools within a Trust are subject to safeguarding duties under legislation including Sections 157 and 175 of the Education Act 2002, the Education and Skills Act 2008, and the Education (Independent School Standards) Regulations 2014.

In addition, we ensure that all safeguarding practice is underpinned by effective information sharing in line with data protection requirements, including the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025.

Legislation & Regulation

This policy is based on the Department for Education's (DfE) statutory guidance: Keeping Children Safe in Education and Working Together to Safeguard Children. We comply with this guidance and the procedures set out by our local safeguarding partners who are detailed at the start of this policy.

This policy has been devised in accordance with the following legislation and guidance:

- [Working together to safeguard children - GOV.UK](#) (2026)
- [Keeping children safe in education 2026 \(comes into force from 1 September 2026\)](#) (2026)
- [Working together to improve school attendance - GOV.UK](#) (updated June 2024)

- [Social workers and other practitioners: attendance considerations - GOV.UK](#) (2026)
- Safeguarding Children Partnership procedures - see school version of this policy on their website
- Safeguarding Children Partnership Protocol: Allegations Against Persons Who Work with Children - see school version of this policy on their website
- [Child abuse concerns: guide for practitioners - GOV.UK](#) (2015)
- [Information sharing advice for safeguarding practitioners - GOV.UK](#) (updated May 2024)
- [Prevent duty guidance: for England and Wales \(accessible\) - GOV.UK](#) (updated March 2024)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK](#) (September 2023)
- [Mandatory reporting of female genital mutilation: procedural information - GOV.UK](#) (updated January 2020)
- [Beyond Referrals: extra-familial harm | Contextual Safeguarding](#) Child sexual exploitation: guide for practitioners DFE (February 2017)
- [Child sexual exploitation: definition and guide for practitioners - GOV.UK](#) (2017)
- [Teaching online safety in schools - GOV.UK](#) (updated January 2023)
- [Mental health and behaviour in schools - GOV.UK](#) (updated November 2018)
- [Data protection in schools - Guidance - GOV.UK](#) (updated March 2026)
- [Children's social care: virtual school head role extension - GOV.UK](#) (updated September 2025)
- [Advice to schools and colleges on gangs and youth violence - GOV.UK](#) (2013)
- [Criminal exploitation of children and vulnerable adults: county lines - GOV.UK](#) (updated October 2023)
- [Relationships and sex education \(RSE\) and health education - GOV.UK](#) (updated December 2025)
- [Domestic Abuse Act 2021 - GOV.UK](#) (updated April 2023)
- [Early years foundation stage \(EYFS\) statutory framework - GOV.UK](#) (updated September 2025)
- [Modern slavery: how to identify and support victims - GOV.UK](#) (updated May 2026)

Equality & Inclusion

All safeguarding practice within the Trust reflects a commitment to equality, inclusion, and respect for diversity, ensuring that no child is disadvantaged or overlooked.

We ensure that all children have the same protection, regardless of any barriers they may face, and we are committed to anti-discriminatory practice and recognise children's diverse circumstances. We are alert to the signs of abuse, neglect and exploitation, and follow our procedures to ensure that children receive effective support, protection, and justice. We listen to our pupils and take seriously what they tell us, children are aware of the adults they can talk to if they have a concern. Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it.

We will ensure concerns are discussed with parents/carers first unless we have reason to believe that doing so would be contrary to the child's welfare.

We give special consideration to children who:

- Have special educational needs 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.
- 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 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 subject to a special guardianship order.
 - Are missing from education.
 - Whose parent/carer has expressed an intention to remove them from school to be home educated.

Culture of Safeguarding

The Trust believes that safeguarding and promoting the welfare of children is everyone's responsibility. This is reflected in a strong and embedded culture of safeguarding across all our schools. Everyone who comes into contact with children and their families has a role to play, and all staff adopt a child-centred approach, ensuring that the best interests of the child are at the forefront of all decisions.

Our safeguarding culture is underpinned by:

- A clear understanding of our moral and statutory responsibilities to safeguard and promote the welfare of children, with all staff and volunteers fully committed to this duty.
- The expectation that all those working within the Trust contribute to creating a safe environment where all children and adults have an equal right to protection, regardless of gender, disability, race, religion, sexual orientation, or culture.
- A culture of vigilance, where all staff maintain an attitude of "it could happen here" and act immediately in the best interests of the child when concerns arise.
- A shared responsibility across the Trust community to recognise and respond to safeguarding concerns, including those arising at home, in the community, or within school. All staff understand reporting procedures and the importance of timely information sharing.
- Strong partnership working with local safeguarding partners, including the local authority, police, and health services (Integrated Care Boards), in line with local arrangements across Birmingham, Solihull and Sandwell and any other local authority that a pupil may reside in.
- Clear leadership and accountability, including the appointment of a Trust Designated Safeguarding Lead at executive level and a nominated Trustee with responsibility for safeguarding.
- Consistent safeguarding arrangements across all schools, with each school maintaining contextualised School-Specific Safeguarding Arrangements to reflect local procedures and risks.

The welfare of our pupils is paramount. The Board of Trustees provide oversight to ensure that each school fulfils its safeguarding responsibilities effectively and works in partnership with

relevant agencies to identify, assess, and support children who may be at risk of harm, in line with local safeguarding procedures.

Roles and responsibilities

We will follow the statutory guidance as set out in the latest Keeping Children Safe in Education, adhering to the roles, responsibilities and expectations identified for:

- Governing bodies, proprietors, and management committees
- The headteacher
- The designated safeguarding lead
- The deputy designated safeguarding lead/s
- Staff

Role	Responsibilities
The Board of Trustees	The Trust Board is responsible for ensuring effective safeguarding arrangements are in place across the Trust by: • Receiving assurance on safeguarding practice, including audits, data, trends, risks and emerging issues. • Ensuring safeguarding remains a strategic priority and a standing item for scrutiny and challenge. • Holding the CEO to account for safeguarding culture, compliance and continuous improvement across the Trust. • Approving and reviewing the Safeguarding and Child Protection Policy and monitoring its implementation. • Ensuring safeguarding arrangements reflect the needs of all pupils, particularly those who may be more vulnerable, including pupils with SEND and those with medical needs. • Ensuring the Trust has effective systems for safer recruitment, managing allegations and low-level concerns, online safety, and staff safeguarding training. • Ensuring Designated Safeguarding Leads have the status, capacity, training and resources necessary to fulfil their responsibilities. • Ensuring compliance with safeguarding legislation and local multi-agency safeguarding arrangements. • Reading and understanding statutory safeguarding guidance, including <i>Keeping Children Safe in Education</i>. Safeguarding Lead Trustee The Safeguarding Lead Trustee provides additional oversight by: • Acting as the Board's safeguarding link and champion. • Meeting regularly with the Trust Designated Safeguarding Lead to review safeguarding assurance, risks and priorities. • Reviewing safeguarding reports, audits and school-level feedback and escalating concerns where necessary. • Providing assurance to the Board regarding the effectiveness of safeguarding arrangements across the Trust.

	Supporting the Trust's whole-organisation approach to safeguarding and child protection.
CEO	The CEO has overall responsibility for ensuring that safeguarding is effectively and consistently implemented across the Trust. The CEO ensures that safeguarding is strategically led, embedded within the culture of the organisation, and prioritised at all levels. The CEO discharges this responsibility by: - Delegating the day-to-day operational oversight and monitoring of safeguarding to the Trust DSL. - Ensuring that safeguarding is reported regularly to the Board of Trustees, providing clear, accurate, and transparent information. - Ensuring that findings and recommendations from safeguarding audits, reviews, and local governance reports are acted upon, appropriately resourced, and lead to sustained improvement. - Maintaining oversight of safeguarding risk across the Trust, ensuring that risks are identified promptly, escalated where necessary, and effectively mitigated.
The Trust Designated Safeguarding Lead	The Trust DSL is the named reporting officer to the Board and will: - Produce regular safeguarding reports for the Board, evidencing compliance, impact, trends, and emerging risks. - Lead and maintain the Trust's safeguarding strategy, ensuring consistency and high standards across all schools. - Take overall responsibility for the Trust safeguarding policy, ensuring alignment with statutory guidance. - Provide strategic support, training, and guidance to school leaders and governors. - Maintain oversight of safeguarding risk and ensure appropriate escalation of serious concerns. - Act as the point of escalation for complex or high-risk cases where required. - Maintain effective relationships with safeguarding partners and external agencies. Be directly available to the Safeguarding Lead Trustee to support scrutiny and assurance. The Trust DSL is not only supportive but also a critical friend who brings independent challenge, ensuring the Board receives an honest assessment of safeguarding practice.
The Trust Safeguarding and Attendance Lead (Operation reporting lead)	The Trust Safeguarding and Attendance Lead acts as the operational reporting lead to the Education Committee, supporting the Trust DSL in ensuring effective oversight and continuous improvement of safeguarding practice across the Trust. This role includes:

	• Producing regular safeguarding reports for the Education Committee, including analysis of data, trends, impact, and next steps. • Leading the annual safeguarding audit process across all Trust schools, providing robust challenge and identifying areas for development. • Reporting audit findings and recommendations to school leaders and the Education Committee. • Carrying out ongoing quality assurance of safeguarding practice across schools. • Supporting the development, implementation, and review of Trust safeguarding policy and procedures. • Providing professional support, guidance, and advice to schools on safeguarding and attendance matters. • Supporting schools with complex or emerging safeguarding concerns. • Ensuring DSLs are appropriately trained and supported. • Facilitating a Trust-wide safeguarding network to promote best practice and consistency.
Headteacher	Within each FET school the Head Teacher is responsible for: • Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL). • Identifying additional members of staff to act as the DSL in his/her absence to ensure there is always cover for the role. • Ensuring that the policies and procedures adopted by the school are followed by all staff. • Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures. • Liaising with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff, contractor or volunteer. • Ensuring the relevant staffing ratios are met, where applicable. • Making sure each child in the Early Years Foundation Stage is assigned a key person.
DSL	The Trust ensures that each school has a Designated Safeguarding Lead (DSL) who is a member of the senior leadership team and has the appropriate status, authority, capacity, time, funding, training and support to carry out the role effectively. The DSL takes lead responsibility for safeguarding and child protection within their school and is responsible for: Managing Referrals • Acting as the first point of contact for safeguarding and child protection concerns.

	• Considering and making referrals to Children's Social Care, the police, the Local Authority Designated Officer (LADO), Channel and other relevant agencies, where appropriate. • Supporting staff who make safeguarding referrals and ensuring appropriate follow-up action is taken. Working with Others • Working in partnership with the Headteacher, safeguarding team, Trust DSL, Trust Safeguarding and Attendance Lead, and other relevant colleagues. • Liaising with Children's Social Care, health services, the police and other agencies to safeguard and promote the welfare of children. • Attending and contributing to multi-agency meetings, including child protection conferences, core groups, strategy discussions, family help meetings and reviews for children in care. • Ensuring information is shared appropriately and safeguarding records are transferred securely when pupils move schools. Information Management • Ensuring that safeguarding concerns are recorded accurately, securely and in a timely manner. • Maintaining detailed, accurate and confidential safeguarding records. • Monitoring safeguarding concerns, actions and outcomes to ensure children receive appropriate support and protection. Raising Awareness and Embedding Safeguarding Culture • Promoting a culture where safeguarding is everyone's responsibility and where the welfare of children is paramount. • Ensuring staff maintain an attitude of "it could happen here" and understand their safeguarding responsibilities. • Ensuring safeguarding policies and procedures are effectively implemented, regularly reviewed and readily accessible. • Supporting the curriculum so that pupils are taught how to keep themselves safe, including online. Training, Knowledge and Support • Ensuring all staff receive appropriate safeguarding training and updates, including induction training for new staff. • Providing advice, guidance and support to staff on safeguarding matters. • Maintaining and regularly updating their own safeguarding knowledge and skills. • Supporting staff to understand local procedures and emerging safeguarding risks. Availability • Being available during term time to discuss safeguarding concerns and provide advice.
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	• Ensuring appropriate arrangements are in place for safeguarding support during school holidays and periods of absence. • Ensuring suitably trained deputy DSLs are available to provide cover when required.
All staff	All staff have a responsibility to safeguard and promote the welfare of children and must: • Read, understand and comply with Part One of Keeping Children Safe in Education (KCSIE), and undertake safeguarding training and updates as required. • Know and follow the school's safeguarding procedures, including the role of the Designated Safeguarding Lead (DSL) and Deputy DSLs. • Be alert to signs of abuse, neglect and exploitation, maintaining an attitude of "it could happen here." › Apply professional curiosity, respectfully, challenge where appropriate, and follow concerns through to ensure children receive appropriate support and protection. • Report concerns about a child immediately and support the provision of family help where appropriate. • Respond appropriately to disclosures and share information in line with safeguarding procedures. • Understand and follow procedures for reporting concerns about the conduct of adults, including low-level concerns and whistleblowing. • Promote and reinforce safeguarding, including online safety, through their day-to-day work with pupils.

Specific Safeguarding Issues

(More detailed information is included within the safeguarding procedures manual on page 18)

The Trust recognises that safeguarding concerns can arise in many forms and that all staff must remain vigilant, exercise professional curiosity and respond promptly to concerns. Staff receive training on identifying and responding to safeguarding risks, including those that may occur within the home, community or online.

Contextual Safeguarding and Vulnerable Pupils

The Trust recognises that children may experience harm outside the family home, including through exploitation, peer-on-peer abuse, online activity and serious violence. Staff will consider the wider context of a child's experiences when assessing risk.

We recognise that some children may be more vulnerable to abuse, neglect or exploitation, including pupils with SEND, children in care, previously looked-after children, those subject to Special Guardianship Orders, young carers, and children experiencing mental health difficulties.

Exploitation and Serious Violence

Staff are trained to identify and respond to Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines activity, serious violence and modern slavery. The Trust recognises that exploited children are victims of abuse, even where their involvement appears voluntary.

Female Genital Mutilation, Forced Marriage and Honour-Based Abuse

The Trust recognises FGM, forced marriage and honour-based abuse as safeguarding concerns. Staff will report concerns in line with statutory guidance and teachers will comply with their mandatory duty to report known cases of FGM to the police.

Preventing Radicalisation

The Trust fulfils its responsibilities under the Prevent Duty. Staff receive appropriate training to identify and respond to concerns relating to radicalisation and extremism, and referrals will be made where appropriate.

Child-on-Child Abuse

The Trust recognises that child-on-child abuse can occur both inside and outside school and may include bullying, online abuse, sexual harassment, sexual violence, harmful sexual behaviour, upskirting and the sharing of nude or semi-nude images.

All concerns will be taken seriously and responded to promptly. Victims will be supported, protected and listened to, while children displaying harmful behaviour will be considered in the context of their own safeguarding needs and will receive appropriate intervention, support and, where necessary, referral to relevant services.

Attendance and Children Missing Education

The Trust recognises that children who are absent from education, particularly those who are persistently absent or missing from education, may be at increased risk of abuse, neglect, exploitation, mental health difficulties or radicalisation.

Schools will follow statutory attendance guidance and Trust attendance safeguarding procedures. The Trust remains responsible for safeguarding pupils attending alternative provision.

Mental Health

The Trust recognises that mental health difficulties can be both a safeguarding concern and an indicator that a child may be experiencing abuse, neglect or exploitation. Staff will report concerns in line with safeguarding procedures.

Online Safety

The Trust is committed to safeguarding pupils online and adopts a whole-school approach to online safety. Appropriate filtering and monitoring systems are in place, and staff, pupils and parents are supported to understand online risks including content, contact, conduct and commerce.

Trustees, leaders and relevant staff understand the filtering and monitoring systems in place and the processes for escalating concerns.

Domestic Abuse

The Trust recognises the impact domestic abuse can have on children and works with partner agencies, including Operation Encompass, to provide timely support.

Staff will also remain alert to child-to-parent abuse and private fostering arrangements.

LGBTQ+ Pupils

The Trust recognises that LGBTQ+ pupils and those perceived to be LGBTQ+ may be more vulnerable to bullying, prejudice and discrimination. We are committed to creating a safe, inclusive environment where all pupils feel respected and supported.

Nurturing and Regulatory Touch

Where appropriate, schools may use planned nurturing or regulatory touch as part of a pupil's support plan. Any touch will be professional, proportionate, consent-based, and in the child's best interests.

Allegations, Low-Level Concerns and Whistleblowing

Concerns about the conduct of adults working with children, including low-level concerns and allegations, will be managed in accordance with the Trust's procedures and statutory guidance. Staff should report such concerns through the school's low-level concerns and allegations processes. Where staff have concerns about safeguarding practice, wrongdoing, or the way concerns have been managed, they should use the Trust's Whistleblowing Policy.

Safer Recruitment

The Trust is committed to safer recruitment and adopts practices that help deter, identify and reject individuals who may pose a risk to children. All appropriate pre-employment checks, including those required for individuals engaged in regulated activity with children, are undertaken in accordance with Keeping Children Safe in Education. The Trust maintains a Single Central Record and ensures that safer recruitment requirements are applied consistently to employees, volunteers, governors/trustees, agency staff and contractors as appropriate.

Further detail regarding recruitment, vetting checks, regulated activity, induction, supervision and ongoing safeguarding responsibilities is set out in the Trust Safer Recruitment Policy.

Working in Partnership with Parents and Carers

FET is committed to working in partnership with parents and carers to safeguard and promote the welfare of children, and to help them understand our statutory responsibilities.

Parents and carers are informed that the Trust has a safeguarding policy, which is available on the schools' websites or on request. They are also made aware of our legal duty to work with other agencies where there are safeguarding concerns, including referrals to local authority services.

We work with parents in a positive, open and respectful way, maintaining confidentiality unless information needs to be shared to protect a child from harm. Where appropriate, concerns will be discussed with parents; however, this will not happen if it could place a child at increased risk. A lack of parental engagement will not prevent appropriate safeguarding action.

To support safeguarding, parents are expected to provide accurate and up-to-date contact information for those with parental responsibility, emergency contacts, and authorised adults for collection. This information is held securely.

FET is committed to providing family help to support children and families as soon as concerns emerge. Family help means identifying and addressing needs at the earliest possible stage to

prevent escalation and improve outcomes. Where appropriate, the Trust will work with parents, carers and relevant agencies to offer coordinated support through family help services. This may include completing a family help assessment and participating in multi-agency plans, ensuring that children and families receive the right support at the right time.

Professional Development and Training

All staff will receive appropriate safeguarding and child protection training (including online safety) both at induction and regularly throughout the year as required. The training will be regularly updated.

All staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

Role	Requirements
Staff	Will undertake safeguarding and child protection training at induction. Read and ensure understanding of the following: • Child Protection and Safeguarding Policy • Behaviour Policy • Staff Code of Conduct • Whistleblowing Procedures • Role of the DSL • Attendance Policy • Online Safety Policy Staff must understand the school's safeguarding systems and their responsibilities and must be able to identify signs of possible abuse, neglect, and exploitation. Training will be updated annually and will be in line with advice from our Local Safeguarding Partners. All staff are responsible for ensuring that their individual understanding of safeguarding is always up to date and must be aware of who they should approach with concerns or questions. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children susceptible to being drawn into terrorism and know how to challenge extremist ideas. All staff must complete safeguarding and child protection training annually as a minimum requirement. This includes reading and confirming their understanding of Part One of <i>Keeping Children Safe in Education</i> (KCSIE), alongside any other safeguarding updates issued by the Trust or school. Additional safeguarding training will be provided throughout the year and schools may coordinate further bespoke training in response to identified needs, emerging risks or local circumstances.

Trustees	Receive safeguarding and child protection training at induction. Receive regular safeguarding updates. Read and understand KCSIE. Undertake annual safeguarding training that enables them to fulfil governance responsibilities and provide effective challenge and oversight.
DSLs/DDSLs	Ensure staff receive regular safeguarding and child protection updates (for example, through emails, e-bulletins, and staff meetings), at least termly. The DSL and Deputy/Deputies will undertake child protection and safeguarding training at least every two years. Update knowledge (particularly local knowledge of safeguarding risks) and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs (Designated Safeguarding Lead), or taking time to read and digest safeguarding policy documents and national updates). Undertake Prevent awareness training. Deputy DSLs are trained to the same standard as the DSL and support the DSL in carrying out safeguarding responsibilities. Whilst activities may be delegated, the ultimate lead responsibility for safeguarding and child protection remains with the DSL.
School leaders	Staff will be made aware of the specific needs of vulnerable children. Notably, children with a Family Support Worker, those with relevant health conditions and young carers. This will include the additional safeguarding risks. Staff must not make assumptions that indicators of possible abuse are simply attributable to the child's SEND needs. It is essential that all concerns are explored thoroughly. Children with SEND may be more vulnerable to child-on-child abuse, may be disproportionately impacted without showing obvious signs, and may face additional barriers such as limited cognitive understanding (e.g., distinguishing fact from fiction online) or communication challenges in reporting harm.
Pupils	The school will ensure all pupils develop their knowledge and understanding of all safeguarding areas in a SEND/developmentally-appropriate manner. This will be mapped out by the school at the start of each academic year and may take the form of assemblies, PSHE (Personal Social and Health Education) sessions, off-curriculum days, notice boards, displays, posters or bespoke sessions from external providers. Where necessary, the school will be responsive to local context and circumstances. Pupils will learn how to identify and manage risks as well as how to mitigate against those risks and how to raise a concern at any time.

Links with other policies

This policy links to the following policies and procedures:

- Staff code of conduct

- Complaints
- Health and safety
- Equality, Equity, Diversity & Inclusion
- Privacy notices
- Whistleblowing
- Acceptable use of IT
- Mobile phones
- Intimate care
- Attendance
- Online safety
- Safer recruitment
- Behaviour & Relationships

Our schools' policies can be found on the school's website, or by contacting the school office. Trust policies can be found here: [FET Policies - Forward Education Trust](#)

Monitoring and Review

The Trust is committed to maintaining effective safeguarding arrangements through regular monitoring, quality assurance and review.

The effectiveness of this policy will be monitored through:

- Regular safeguarding reports to Trustees and the Education Committee.
- Annual safeguarding audits and Trust quality assurance activities.
- Review of safeguarding data, attendance, child protection practice, allegations and low-level concerns.
- Feedback from pupils, staff, parents and external agencies where appropriate.
- Ongoing evaluation of training, compliance and safeguarding culture across the Trust.

This policy will be reviewed annually by the Trust Designated Safeguarding Lead and approved by the Board of Trustees. It will also be updated sooner where changes in legislation, statutory guidance, local safeguarding arrangements, or learning from safeguarding reviews require amendments.

Important Contacts

External Agency	Contact Details
LA Education Safeguarding Officer	See school version of this policy on their website for all of the external agency contact information relevant to their setting
School Nurse Team	
LA Prevent Officer	
Harmful Sexual Behaviours Team	
Child Exploitation Team/Empower U Hub Sandwell Horizons/Solihull Exploitation Panel	
Family Help Team/Strengthening Families Team	
Children's Centre/Family Hub	
Elective Home Education Team	

Child Missing Education Team	
SENAR/Inclusion Team	
Children's Mental Health Service (CAHMS, SOLAR, STICK, BEAM)	
Woman's Aid	
ManKind Initiative	Freephone 0808 800 1170 (will not show on your bills) Helpline 01823 334 244
Food Bank	
Linked Police Officer	101 - when the situation is not urgent but still needs police attention. 999 - when there is immediate danger or a crime in progress.
Health	101 - when you need medical help or advice quickly, but it's not an emergency. 999 - when it is life-threatening or very serious.
LA Attendance Team LA Attendance Support Officer	

Safeguarding Procedures Manual

Definitions

Safeguarding and promoting the welfare of children

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Section 1 and 2 of the procedure manual below outlines the categories and types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Section 1 of the procedure manual below defines neglect in more detail.

Children includes everyone under the age of 18 in line with Keeping Children Safe in Education.

Staff refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, adoptive parents, special guardians and LA (Local Authority) corporate parents.

Specific safeguarding issues – detailed

The Trust recognises the emphasis within KCSIE on the importance of professional curiosity and the early identification of vulnerability and risk. Staff are expected to remain alert to indicators that a child may be experiencing abuse, neglect, exploitation, mental health difficulties, or other safeguarding concerns, and to consider the wider context of a child's circumstances and presentation.

The Trust promotes a culture where staff look beyond isolated incidents or behaviours, exercise professional judgement, and share concerns promptly to ensure that emerging needs are identified and addressed at the earliest opportunity. This proactive approach supports effective early intervention and reflects the principle that safeguarding is everyone's responsibility.

1. Contextual safeguarding

Within FET, we recognise that safeguarding incidents and behaviours may occur both within and beyond the school environment. These may be associated with factors outside the family home and can take place between children in community spaces, online environments, or other settings. This is referred to as contextual safeguarding.

It is essential that all staff understand this concept and consider whether children may be at risk of harm or exploitation outside of their immediate family context. Through training, staff and volunteers are supported to recognise that extra-familial harm can take a variety of forms, including (but not limited to) child sexual exploitation, child criminal exploitation, and serious youth violence. When reporting concerns, staff must provide as much relevant information and context as possible. This enables the DSL to build a holistic understanding of the child's circumstances and ensures that referrals appropriately reflect the full context of any potential risk or harm.

FET recognises that children with Special Educational Needs and/or Disabilities (SEND) can face additional safeguarding challenges. These are addressed through staff training and awareness. Such challenges may include:

- Assumptions that indicators of possible abuse (such as behaviour, mood, or injury) are related to a child's disability without further exploration.
- Increased vulnerability to bullying or exploitation, which may not always be overtly visible.
- Communication barriers, which can make it more difficult for children to express concerns or for staff to recognise when something is wrong.

Staff must remain vigilant and ensure that these factors do not prevent concerns from being identified, explored, and acted upon.

FET recognises that children who are looked after, or who have previously been looked after, or those subject to a Special Guardianship Order (SGO), may remain particularly vulnerable. All staff must have the knowledge, skills, and understanding to effectively safeguard these children.

It is essential that all agencies work collaboratively and that timely, coordinated action is taken where concerns arise. Close partnership working is critical to ensuring that the needs of these children are understood and that appropriate support and protection are in place.

2. Exploitation and serious violence

FET staff are trained to recognise that both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse. They occur where an individual or group exploits an imbalance of power—based on factors such as age, gender, cognitive ability, status, or access to resources—to coerce, manipulate, or deceive a child into sexual or criminal activity. Exploitation can occur even where activity appears consensual and may take place both in person and online. CSE is a form of child sexual abuse where a child is coerced or manipulated into sexual activity in exchange for something they need or want, for the benefit of the perpetrator. This may occur without physical contact, and children may not always recognise that they are being exploited. CCE, including county lines activity, involves the grooming and exploitation of children by individuals or gangs to transport items. Indicators can include missing episodes and unexplained travel. Children may be coerced through threats, violence, or debt, and may carry weapons as a result of fear or control.

FET recognises that children involved in exploitation are victims, even where their involvement appears voluntary. We also recognise that experiences may differ across groups and that vulnerability to multiple forms of exploitation can occur.

Staff are trained to identify indicators of exploitation and serious violence and will act promptly where concerns arise. Referrals will be made to appropriate safeguarding services (e.g. MASH/CASS), alongside consideration of specialist local support.

3. Female Genital Mutilation (FGM) and Honour-Based Abuse (HBA)

At FET, we recognise that staff are well placed to identify concerns and take action to prevent children from becoming victims of FGM and so-called HBA. These issues are addressed through safeguarding training to ensure staff are aware of the indicators and appropriate responses. Where staff have concerns that a child may be at risk of HBA, they must inform the DSL, who will follow local safeguarding procedures and engage appropriate multi-agency partners, including the police and children's social care.

FGM is a form of abuse and, where it is known to have been carried out on a girl under the age of 18, teachers have a mandatory duty to report this directly to the police. This duty applies where there is either a disclosure from the child or visual evidence. Failure to report such cases may result in disciplinary action and police intervention. Staff will be supported to understand when and how to make a report in line with statutory guidance.

FET also recognises that forced marriage is a criminal offence. A forced marriage occurs where one or both individuals do not consent and coercion, violence, or threats are used. It is also an offence to carry out any conduct intended to cause a child to marry before the age of 18, even where coercion is not evident.

Staff must remain vigilant to the signs of these forms of abuse and act promptly, reporting concerns in line with safeguarding procedures so that appropriate action can be taken.

4. Preventing radicalisation and extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.

Within FET schools, we will ensure that:

- Through annual prevent training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise.

- There are systems in place for keeping pupils safe from extremist material when accessing the internet in across our Trust by using effective online safety policies.
- The Lead DSL in each FET school has received Prevent training and acts as the point of contact for any concerns relating to radicalisation and extremism.
- The DSL makes referrals in accordance with their local Prevent Officer.
- Through our curriculum, we promote the spiritual, moral, social and cultural development of pupils.

5. Child on child abuse

Within FET, we recognise that safeguarding issues can arise through child-on-child abuse. This may include, but is not limited to, bullying (including online), physical abuse, sexual violence and harassment, upskirting, sharing of sexual images (sexting), and initiation or hazing behaviours. We understand that abuse between children can be just as harmful as abuse by adults. It can occur within relationships and may not always be directly reported. Staff must remain vigilant to signs and behaviours that may indicate abuse and must never dismiss concerns as “banter” or part of growing up.

All concerns about child-on-child abuse will be taken seriously and responded to in line with safeguarding procedures. Staff must report concerns promptly to the DSL, who will ensure that appropriate action is taken, including victim support, risk management and working with external agencies where required.

FET is committed to:

- Ensuring victims are supported, heard, and kept safe, and never made to feel blamed or ashamed.
- Ensuring that children have multiple, accessible ways to report concerns.
- Providing appropriate support for all children involved, including those displaying harmful behaviour.
- Recording all concerns, decisions, and actions clearly and following them up appropriately.
- Identifying patterns of concerning behaviour and taking action to address them.

Staff are trained to recognise indicators of abuse and harmful sexual behaviour, and to seek advice where needed. Responses will be proportionate to the needs of the child and may include risk assessments, early intervention, or referral to specialist services.

We minimise risk by having:

- A strong behaviour policy promoting respect and positive relationships
- A planned curriculum (including RSHE) that educates pupils about healthy relationships, consent, boundaries and online safety
- Appropriate staff supervision in identified high-risk areas and times
- Regular safeguarding training for all staff
- A culture of vigilance where staff recognise and respond to early indicators of concern

All concerns will be taken seriously and responded to promptly. Victims will be supported, protected and listened to, while children displaying harmful behaviour will be considered in the context of their own safeguarding needs and will receive appropriate intervention, support and, where necessary, referral to relevant services.

6. Modern day slavery

We recognise that modern slavery includes human trafficking, slavery, servitude, and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, criminal exploitation, slavery and the removal of organs.

Staff are trained to be aware of the indicators of modern slavery and will refer to statutory guidance where concerns arise to ensure that appropriate action is taken and victims are supported.

Where there are concerns relating to modern slavery, we will refer to the Department for Education (DfE) guidance “Modern slavery: how to identify and support victims” to inform our response and ensure appropriate action is taken.

7. Safeguarding responses to children absent from education

FET acknowledges that children who are absent from education, particularly on a repeated or prolonged basis, may be at increased risk of harm, including abuse, neglect, or exploitation. Staff are expected to remain vigilant and recognise their role in identifying and responding to such risks. FET follows statutory attendance guidance and ensures that robust procedures are in place, including:

- Taking and monitoring attendance registers daily.
- Making timely contact with parents/carers and emergency contacts where pupils are absent.
- Ensuring at least two emergency contact details are held wherever possible.
- Reporting any concerns about absence promptly to the DSL.
- Working collaboratively across safeguarding, attendance, and pastoral teams to ensure a coordinated and informed response.
- Acting quickly to address patterns of poor or unexplained attendance through early intervention.
- Maintaining safeguarding responsibility for pupils in alternative provision. Where pupils attend alternative provision, the school remains responsible for ensuring safeguarding arrangements are effective and will seek assurance regarding attendance, welfare and safeguarding practice.
- Informing the Local Authority when a pupil is removed from roll and ensuring safeguarding records are transferred appropriately.
- Follow trust attendance safeguarding protocols - see Appendix 4.

8. CME

A child missing education is potentially an indicator of abuse, neglect, exploitation, mental health concerns, criminal activity, child sexual exploitation, child criminal exploitation or radicalisation. The numbers of CME will be reported on by the school regularly and will be reviewed by the Trust Safeguarding & Attendance lead. Any concerns will be immediately addressed (i.e., asking about the steps being taken to trace and track the movement of CME pupils and actions being taken to ensure their safety). All our schools will adhere to the FET Safeguarding Attendance Protocols detailed in appendix 4.

9. Mental health

Within FET, we recognise that mental health problems can, in some cases, be an indicator that a child has experienced or is at risk of abuse, neglect, or exploitation. Through training, staff are

supported to identify changes in behaviour that may suggest a child is experiencing or developing mental health difficulties.

We understand that adverse childhood experiences, including abuse and neglect, can have a significant and lasting impact on a child's mental health, behaviour, and learning. Staff are therefore trained to recognise these links and respond appropriately.

Where a mental health concern also presents as a safeguarding concern, staff must take immediate action and report this to the Designated Safeguarding Lead (DSL).

Each school within FET has a named Mental Health Lead, and clear systems are in place to identify and respond to concerns, including working with external agencies where appropriate.

10. Online safety and the use of mobile technology

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, we:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers, Trustees and Academy Community Council members
- Protect and educate the entire school community the safe, and appropriate use of technology, including mobile phones, smart technology, cameras and 'Meta' glasses, (which we refer to as 'mobile devices').
- 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.
- Have a Mobile Phone policy in place which captures the use of mobile, smart technology and cameras including 'Meta' glasses.

Trustees, leaders and relevant staff understand the filtering and monitoring systems in place, their effectiveness, and the process for escalation of concerns identified through those systems.

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, 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 purpose.

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.

We have robust a filtering and monitoring system in place, to limit children's exposure to the 4 key categories of risk from the school's IT systems.

Alongside this, we recognise the potential risks associated with the exposure of Exchangeable Image File Format (EXIF) data when using photographs, as it can unintentionally reveal sensitive

information such as location, date, and device details. If images are shared publicly (e.g. on school websites or school social media accounts), this metadata could be accessed and used to identify a child's whereabouts or patterns of activity, increasing the risk of misuse. Our schools ensure that EXIF data is removed from images prior to publication and that staff are aware of safe image-sharing practices to protect pupils' privacy and security. Consent is obtained from parents and carers at the start of each academic year, and they are informed of these risks through consent forms, this safeguarding policy, and awareness-raising activities.

11. Domestic abuse

We recognise that domestic abuse can involve a range of behaviours, including psychological, physical, sexual, financial, and emotional abuse, and may occur as a single incident or a pattern over time.

We understand that children can be victims of domestic abuse, both directly and indirectly, through seeing, hearing, or experiencing its effects. This can have a significant and long-term impact on their health, well-being, development, and ability to learn.

Staff are trained to recognise the signs of domestic abuse and to respond in line with safeguarding procedures, ensuring that concerns are reported promptly to the DSL. Appropriate support will be provided, including signposting to relevant services.

All of our schools are a part of Operation Encompass which is national scheme that operates jointly between schools and police forces. Operation Encompass is a police and Education early intervention safeguarding partnership that supports children and young people exposed to Domestic Abuse. It aims to ensure Schools are notified in a timely manner of any Domestic Abuse incident where child/ren are present or registered at the address. This early notification should mean that, in the majority of cases, schools are alerted in readiness for the children arriving at school the first working day following an incident.

The Trust recognises that abuse can also occur from a child towards a parent or carer. Staff will be alert to signs of child-to-parent abuse and ensure concerns are considered within safeguarding assessments and multi-agency planning.

Staff will be alert to situations where children are living with adults who are not their birth parents and will consider whether a private fostering arrangement should be reported to the local authority.

12. LGBTQ+ pupils

We recognise that being lesbian, gay, bisexual, or questioning gender identity is not, in itself, a risk factor for harm. However, in line with Keeping Children Safe in Education, we acknowledge that these pupils, along with those perceived to be LGBTQ+, may be more vulnerable to bullying, discrimination, or abuse.

FET is committed to reducing these risks by creating a safe, inclusive environment where pupils feel able to speak openly and seek support. Through our curriculum and wider culture, we actively challenge homophobic, biphobic, and transphobic behaviour and promote respect and inclusion.

13. Nurturing and regulatory touch

As part of our commitment to safeguarding, inclusion and emotional wellbeing, our schools recognise that some pupils benefit from appropriately planned, professional and consent-based touch as part of their nurturing and regulation support. Opportunities for nurturing touch and/or

regulatory touch may be included within a pupil's daily timetable, risk assessment or individual support plan where this is deemed beneficial and, in the child's best interests. Such touch is always delivered by trained staff, in a manner that is safe, respectful, developmentally appropriate and responsive to the needs of the individual pupil. Parents and carers are informed of this approach during the admission and induction process. The school acknowledges that nurturing touch can contribute positively to a child's sense of safety, connection and wellbeing and may support physical and emotional health. Regulatory touch may also assist pupils to maintain or regain emotional regulation, enabling them to remain engaged in learning and access educational opportunities more successfully. All touch used within school is guided by safeguarding principles, professional boundaries and the individual needs and preferences of the child.

Allegations and/or low-level concerns against staff

Allegations and/or low-level concerns against staff will be handled in accordance with our procedures for dealing with allegations of abuse made against staff which are detailed in the staff code of conduct.

Whistleblowing

The Trust has a separate Whistleblowing policy that covers concerns regarding the way the school safeguards pupils including poor or unsafe practice, or potential failures.

Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. 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, rationale behind decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child using Child Protection Online Monitoring System (CPOMS).

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. Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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 place of education 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.

Information Sharing

At FET, we recognise that effective information sharing is essential to safeguarding and promoting the welfare of children. Timely and appropriate sharing of information enables staff and partner agencies to make informed decisions and provide the right support.

Staff understand that concerns about a child's safety or welfare must never be delayed due to uncertainty around information sharing. Where there is a safeguarding concern, information will be shared with the DSL without delay, who will take appropriate action, including sharing information with external agencies where necessary.

Information will be shared in line with statutory guidance and data protection requirements, including the UK GDPR and Data Protection Act 2018. FET recognises that data protection legislation does not prevent the sharing of information where it is necessary to protect children. FET works in partnership with relevant agencies, including children's social care, the police, and health services, to ensure a coordinated and effective safeguarding response. Wherever possible, information will be shared with the consent of the individual; however, consent is not required where there is a risk of significant harm.

All information sharing decisions will be recorded appropriately to ensure accountability and transparency.

Appendix 1: Child Protection Procedures

Further information on school-specific procedures can be found within each school's Safeguarding and Child Protection Policy, available on their respective websites.

Appendix 2: Cause for concern form

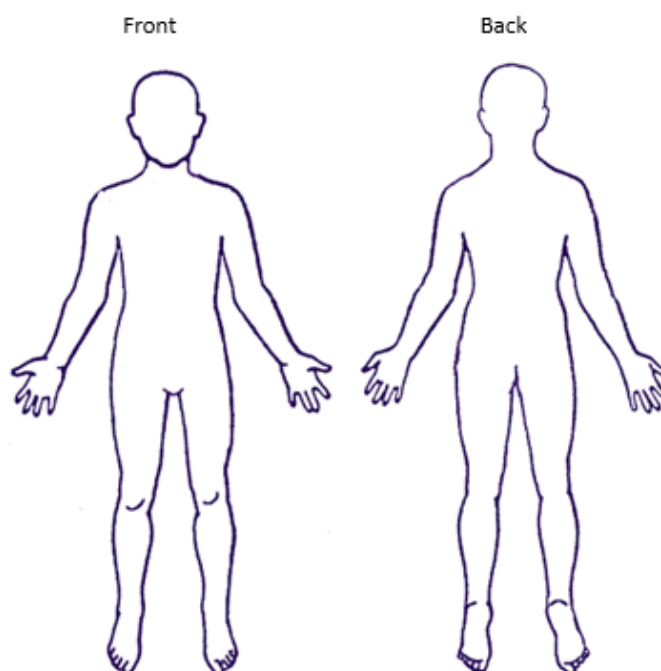


Safeguarding – Disclosure/Cause for Concern Record

Name of Child:		DOB:	Class:
Type of Concern (please tick)			
Disclosure			
Cause for Concern			
Recorded by:	Position:	Date:	Time:
(Please note: recordings need to be accurate, factual and not opinion based)			
(continue over leaf if required)			

Record of disclosure or cause for concern continued:

Please use the diagram below using an 'X' to show any physical marks seen or disclosed by the child



Appendix 3: LA escalation Procedures

Further information can be found within each school's individual policies, available on their respective websites.

Appendix 4: FET Attendance Safeguarding Protocols



THE
BRIDGE
SCHOOL

THE HEIGHTS
ACADEMY

FORWARD
EDUCATION TRUST

LEYCROFT
ACADEMY



FET Attendance Safeguarding Protocols

If a child is subject to a CP/CIN plan or you have any concerns about a child's safety, contact the Police for support. If there are other professionals involved with a family i.e. a social worker school must notify them of the absence by day 2. Day 1 & 2 of absence - Follow your schools' procedures.

DAY 3 OF ABSENCE

Repeat 1st day absence procedures & state as part of the schools Attendance Policy, a Welfare Home Visit is to be arranged and conducted due to the pupil(s) not being seen for 3 school days. Visit to be conducted & recorded on the BROMCOM system – **Welfare Home visit completed, pupil seen safe and well, no concerns.** If the pupil is vulnerable or safeguarding concerns are raised the visit is to be recorded on CPOMs. If no one is home, **leave a Welfare Visit slip** explaining the visit & next steps, and ask the family to contact the school ASAP. **HT & DSL to be informed of any concerns raised during the visit.**

DAY 4 OF ABSENCE

If all Parental Responsibility holders are unreachable, the school should contact all listed emergency contacts until a PR holder is reached to arrange a Welfare Home Visit. Once contact is made, the visit must be completed and recorded on BROMCOM. If the pupil is vulnerable or safeguarding concerns are raised the visit is to be recorded on CPOMs. **All forms of contact should be attempted for adults that hold PR (Dojo, Email, Text, Telephone Call, Letter). Ensure all attempts to make contact are recorded on CPOMs.**

DAY 5 OF ABSENCE

If no contact is made after 5 school days & no professionals have seen the pupil, **if the family does not have an allocated Social Worker a CASS/MASH referral must be submitted.** If there are other professionals involved i.e. a social worker, school must update them & enquire when the professional last saw the pupil &/or if they are due to see them. If they have seen or are due to see the pupil this must be recorded on CPOMs stating that a professional has confirmed that they have seen the pupil safe and well. Request that the professional puts it in writing by email. **Ensure the CME checklist has been completed. A police welfare visit should be requested.**

DAY 10 OF ABSENCE

School must inform the L.A CME team of any pupil who has been absent for 10 consecutive school days and whose whereabouts remain unknown after reasonable enquiries, (CME checklist). Continue efforts to re-establish contact with the family to complete a Welfare Home Visit and offer support to facilitate the pupil's return to school and follow and record any advice given by the LA teams on CPOMs. **Continue to liaise with CME/Police/CASS/MASH/LA and any other relevant professionals.**

Appendix 5: Allegations of abuse made against staff

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a member of staff, including staff at schools or the central team Trust staff, Trustee, ACC member, agency staff, 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

We will consult the relevant local authority designated officer (LADO) for advice and guidance. We will deal with any allegation in a timely manner, 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.

For school based staff and volunteers at school - the Headteacher will act as the case manager.

For Headteachers – the Director of Education will act as case manager.

For central Trust staff - the CEO will act as case manager.

For the CEO – The Chair of Trustees will act as case manager.

For agency staff/contractor - the employer will act as case manager.

The case manager will be supported by the Trust Designated Safeguarding Lead with the exception of an allegation against a headteacher when the Trust Safeguarding and Attendance Lead will support.

The Head of HR will support with all allegations.

In the case of allegations against agency staff or contractors, the Trust will support by providing any relevant information and through regular liaison with the case manager.

The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be managed in line with policy and statutory requirements.

Suspension

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, and a risk assessment cannot mitigate the risk of harm or the case is so serious that there might be grounds for dismissal. In such cases, suspension will only occur after all other options available have been considered 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 seek advice from the Trust Head of HR and the designated officer at the local authority, as well as the police and children's social care where appropriate.

Definitions for outcomes of allegation investigations – as defined by Keeping Children Safe in Education

- **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:

Notify the Trust Designated Safeguarding Lead who may consult with the Head of HR for advice.

- Conduct basic enquiries in line with local 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 relevant Local Authority Designated Officer (LADO) This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police)
- Inform the subject of the allegation of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). The case manager will seek advice from the LADO as to whether it is appropriate to inform the person who is the subject of the allegation. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children 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 Trust DSL and Head of HR before any decision is made to suspend. Responsibility to suspend is a decision for the CEO. Advice will be sought from the LADO, police and/or children's social care services, as appropriate
- 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 Trust DSL and make a risk assessment of the situation. If necessary, then the DSL may make a referral to children's social care

- › **If suspension is considered necessary**, the suspension risk assessment will be completed. The record will include information about the alternatives to suspension that have been considered. The Head of HR will provide guidance regarding the letter of suspension.
- › **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 LADO 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 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. The Trust Employee Assistance Programme provides support such as welfare counselling or medical advice. Support may also be provided by trade union representatives.
 - 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 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)

Seek advice from the Head of HR regarding whether to make a referral to the DBS. Where applicable, schools with Ofsted-registered EYFS provision will notify Ofsted of any allegation of serious harm or abuse and any action taken in response, as soon as reasonably practicable and within 14 days of the allegation 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.

Allegations involving agency staff, contractors and third-party employees

When using an agency, contractor or external provider, we will ensure they are aware of our procedures for managing allegations and will keep them updated on relevant safeguarding policies where appropriate.

Allegations or safeguarding concerns relating to individuals not directly employed by the Trust, including supply staff, agency workers, contractors, and employees of third-party organisations working on Trust premises (for example facilities management, catering, cleaning, estates, IT, transport or other commissioned services), will be shared with their employer, who will act as the case manager. The Trust may invite the employer's HR representative or equivalent to relevant meetings where appropriate.

If there are concerns or an allegation is made against someone not directly employed by the Trust, we will, in addition to our standard procedures:

- Not cease using the individual solely on the basis of an allegation without establishing the facts and seeking advice from the LADO where appropriate.
- Liaise with the individual's employer to determine whether temporary redeployment, suspension or alternative arrangements are required while enquiries are undertaken.
- Work collaboratively with the employer and relevant agencies, whilst taking the lead in gathering and sharing information required to support any safeguarding enquiries.
- Ensure that relevant safeguarding information, including any previous concerns known to the employer, is appropriately considered as part of the investigation and decision-making process.
- Maintain oversight of safeguarding risks on Trust premises and take all necessary steps to protect pupils whilst investigations are ongoing.

Timescales

We will deal with all allegations in a timely matter, however depending on the nature of the allegations and the involvement of external agencies this will likely vary from case to case. However, the primary focus will remain on ensuring children are safe and that we uphold our statutory duties.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS and the Teacher Regulation Agency.

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 whether the child and/or the individual who made the allegation requires support. Where appropriate, referrals to children's social care or other support services will be considered, particularly where the allegation may have been a cry for help.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child person who

made the allegation is in need of help, or the allegation may have been a cry for help, a referral to 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 Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children 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 report 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, false or unfounded 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 children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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 will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the Trust'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 Trust 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.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- Humiliating pupils

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
- Ensure that staff are aware that all low-level concerns should be reported to the Headteacher, or the Deputy Headteacher in their absence, and that all such concerns are recorded in accordance with the school's procedures
- 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 school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Trust representative/ headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

They will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's Staff Code of Conduct.

The Headteacher will be the ultimate decision-maker in relation to all low-level concerns within their school, although they may seek advice from or work in collaboration with the Trust DSL.

The Trust DSL will be the ultimate decision-maker in relation to low-level concerns involving members of the central team.

Where a low-level concern relates to the Trust DSL or the CEO, responsibility for decision-making will rest with the Lead Trustee.

The Trust and all schools within the Trust will have regard to the 'Low-level concerns' guidance set out in KCSIE.

The Trust DSL and the Trust Safeguarding and Attendance Lead will provide strategic oversight and quality assurance of the management of low-level concerns across the Trust.

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 Data Protection Act 2018, UK General Data Protection Regulation and Data (Use and Access) Act 2025.
 - 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 harms 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 6: Induction Checklist

Further information can be found within each school's individual policies, available on their respective websites.