FRONTIER
LEARNING TRUST

Child protection and safeguarding policy (including safer recruitment, allegations against staff and low-level concerns)

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Approved by	**SLT & Board of Trustees**

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
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1. Purpose and Scope

Frontier Learning Trust (FLT) aims to provide an environment where all students are safe, secure, valued, respected, and listened to. We are committed to safeguarding and promoting the welfare of our students and expect all staff and volunteers to share this commitment. Staff must demonstrate their understanding of how each individual adult working on behalf of the FLT has an active part to play in protecting students from harm and promoting their welfare.

Safeguarding is everyone's responsibility, and everyone plays a crucial role in promoting a safe environment. All staff receive appropriate training during their induction period, and regularly thereafter so that they are equipped with the skills and understanding needed to keep students safe.

FLT will always follow safer recruitment procedures so that we can be confident that all adults working in our Trust are safe to do so.

The Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote students' welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

The policy will be reviewed annually.

This policy is available to all parents/guardians/carers from our website.

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), the Maintained schools governance guide and Academy trust governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners** (see section 3).

The full list of legislation that this policy is based on can be found in Appendix 5.

Our Trust procedures for safeguarding students will always be compliant with the Local Safeguarding Children Board for Barnet Child Protection Procedures produced by the Safeguarding Children Board. Those procedures which have been adopted by the Local Safeguarding Children Board (Barnet Safeguarding Children Partnership) are available from**: https://thebarnetscp.org.uk/bscp**

Supporting Documents

This policy should be read alongside the following FLT policies, procedures, and guidance:

- Staff and Student Code of Conduct
- Attendance Policy
- Health & Safety
- HR Policies
- Whistleblowing Policy
- Visiting Speakers Policy
- Staff and Student Disciplinary Policies
- Digital and Online Safety Policy

3. Definitions

As a Trust, we have students from between 16 years and 19 years of age. We therefore have some students that would be defined as children and some as adults. For the purposes of this policy, whilst "child" is ordinarily defined as any person under eighteen, "Keeping Children Safe in Education", to which this policy adheres, states that we have a duty of care to all students, including those that turn eighteen in their time with us.

Safeguarding and promoting the welfare of students means:

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

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

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

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 images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). 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 an area in the LA area

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

Alleged perpetrator(s) and **perpetrators(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of students) 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.

4. Equality statement

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

We give special consideration to students who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- 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 or previously looked after (see section 13)
- Are absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school/college to be home educated
- Students with family members in prison

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Governors/Trustees in the Trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended college/school and off-site activities.

The Trust plays a crucial role in preventative education. This is in the context of a whole-college/school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

5.1 All staff

All staff will:

- Read and understand Part One of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Foster a safe and inclusive environment across the Trust

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, behaviour policy, student/staff code of conduct, the role and identity of the designated safeguarding leads (DSLs) and deputies (DDSL[2]s), the Digital and Online Safety Policy and the safeguarding response to students who are absent from education. The early help assessment process, including family help, and their role in it, including identifying emerging problems, liaising with the DSLs/DDSLs, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a student tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- The fact that students can be at risk of harm inside and outside of their home, at college/school and online
- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- The fact that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other students
- That a student and their family may be experiencing multiple needs at the same time
- Understand how misogyny, misandry and harmful gender-based attitudes can contribute to safeguarding risks
- What to look for to identify students who need help or protection

Section 16 and Appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

The DSLs are members of the Senior Leadership Team. The Trust/Woodhouse College's DSL is Sally Casson and Tim Grundy is the DSL for Imperial Maths School. The DSLs take lead responsibility for child protection and wider safeguarding in the Trust. This includes online safety and understanding our filtering and monitoring processes on Trust devices and networks to keep students safe online.

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

When the DSLs are absent, the DDSLs will act as cover.

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

- Ensure that the safeguarding policies and procedures are fully implemented across the Trust and that staff fully understand their responsibilities and duties.
- Ensure that resources are allocated to enable the Deputy Designated Safeguarding Leads (DDSLs), as needed, to attend strategy discussions, interagency meetings and contribute to assessments
- Ensure that members of staff have received training in line with their roles
- Ensure that FLT responds appropriately to new legislation including the Counter Terrorism and Security Act (2015) and has due regard to the need to safeguard young people against potential radicalisation this includes regular staff Prevent training
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Ensure that all Trust staff, volunteers and contractors are aware of the Trust's policy for safeguarding children and students and referral procedures and know how to recognise any concerns.
- Provide supervision sessions for Safeguarding Coordinators.

The DSLs will also:

- Keep the CEO (Woodhouse College)/Head Teacher (Imperial Maths School) informed of any issues

- 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 Trust's policies
- Be confident that they know what local specialist support is available to support all students 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 students must have an 'appropriate adult' to support and help them in the case of a police investigation or search

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

5.3 The Deputy Designated Safeguarding Leads (DDSLs/ Safeguarding Coordinators)

The DDSLs will:

- Monitor and audit safeguarding practices across campus including the referral of cases externally and the centralised record of all safeguarding activity to ensure consistent and good practice.
- Ensure that detailed and accurate written records are kept, even where that concern does not lead to an external referral.
- Ensure that all such records are kept confidentially and securely.
- Act as a focal point for staff concerns and liaison with other agencies and professionals.
- Attend appropriate training as required to keep up to date with local and national issues and in fulfilling the role of the DDSL.
- Lead on the induction and refresher training for all staff including Prevent training.
- Act as a focal point for staff concerns, safeguarding referrals and represent The Trust at the Local Safeguarding Children's Board and disseminate to Trust safeguarding team.
- Oversee the referral of cases of suspected self-harm, harm to others or from others or allegations to the relevant investigating agency.
- Monitor and audit safeguarding practices across FLT including the referral of cases externally to ensure consistent and good practice
- Ensure that Safeguarding team members receive appropriate training at least once every two years.
- Attend appropriate training as required to keep up to date with local and national issues and in fulfilling the role of an DDSL/ Safeguarding Coordinator.
- Liaise with Social Services and Children's Services in accordance with the Local Safeguarding Children Board procedures.

5.4 The Board of Trustees and Local Governing Body

The Trustees:

- Ensure the Trust's policy for safeguarding students and associated procedures are in place and implemented to ensure the welfare of the student cohort.
- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our college/school's local multi-agency safeguarding arrangements

- Appoint a link Trustee to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness.
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Ensuring that reviews should are carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSLs/DDSLs have the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSLs have lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- FLT has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that students with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the participants who attend these services/activities are enrolled students:
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with FLT about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using FLT premises, and that any agreement to use the premises would be terminated if the other body fails to comply

All Trustee and Governors will read Keeping Children Safe in Education in its entirety.

Section 16 of this policy has information on how Trustee/Governors are supported to fulfil their role.

5.5 The CEO/ Headteacher

The CEO/Headteacher are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the Trust and via the website
- Ensuring that the DSLs/DDSLs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSLs are absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSLs on this

5.6 Virtual school heads

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

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

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

6. Confidentiality

Information about students given to FLT by students, their parents/ guardians/ carers or by other agencies will be treated sensitively. Staff will be given relevant information only where and when it is necessary to support the student's welfare, safety, or learning.

We are under a duty to share any information which is of a child protection or safeguarding nature and 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 students.

- 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
- 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 student that they will not tell anyone about a report of abuse, as this may not be in the student's best interests
- If a victim asks the Trust not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSLs will have to balance the victim's wishes against their duty to protect the victim and other students
    - The DSLs should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)

        - The basic safeguarding principle is: if a student is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal 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 DSLs/DDSLs
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

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

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education health and care plan (EHCP)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently absent from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is absent from education, or persistently absent from college/school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

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

Abuse is any form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another student or peer.

A referral will be made to local authority children's social care and/or the police **immediately** if we believe a student is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral but as a Trust we recommend these are made by DSLs/DDSLs.**

Staff must tell the DSLs/DDSLs (see section 5.2) as soon as possible if they have made a referral directly.

We follow the local procedures for making a referral, as per the arrangements put in place by the 3 safeguarding partners.

Any concerns regarding a student carrying, using or expressing an intention to us a weapon must be reported *immediately* to the DSL/DDSL.

7.2 If a student makes a disclosure to you

If a young person is suffering abuse, then the likelihood is that they will talk to someone they know and trust. False allegations of abuse do occur, but they are rare. Any allegations of abuse, or suspicions of abuse, need to be taken seriously and managed in a sensitive manner. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report

No Trust member of staff conducts investigations or decides whether a student has been abused. Our obligation is to notice and report. Individual members of staff should never deal with child abuse disclosures in isolation. Information will be confidential and only shared with people where it is necessary for the protection of the student.

If a student discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the student they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise confidentiality
- Write up your conversation as soon as possible in the student's own words on MyConcern. Stick to the facts, and do not put your own judgement on it
- If appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSLs/DDSLs as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some students 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 professional curiosity and speaking to the DSLs/DDSLs if you have concerns about a student.

7.3 If you discover that FGM has taken place or a student 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 student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4 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, 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 **student under 18** must speak to the DSLs/DDSLs and follow our local safeguarding procedures.

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

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

7.4 If you have concerns about a student (as opposed to believing a student is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSLs/DDSLs first to agree a course of action.

If in exceptional circumstances the DSLs/DDSLs are not available, this should not delay appropriate action being taken. Speak to a member of the Safeguarding team, 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 0808 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 DSLs/DDSLs as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSLs/DDSLs will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment.

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

The DSLs/DDSLs will keep the case under constant review, and the Trust will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSLs/DDSLs will make the referral.

If you make a referral directly (see section 7.1), you must tell the DSLs/DDSLs as soon as possible.

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

7.5 If you have concerns about extremism

If a student is suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSLs/DDSLs first to agree a course of action.

If in exceptional circumstances the DSLs/DDSLs are not available, this should not delay appropriate action being taken. Speak to a member of the Safeguarding team, 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 DSLs/DDSLs 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 education staff and governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

7.6 If you have a concern about mental health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a student may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations

- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a student that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSLs/DDSLs to agree a course of action.

Further information can be found in the Department for Education guidance on mental health and behaviour in schools.

7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to students, speak to the Principal and CEO/Head Teacher as soon as possible. If the concerns/allegations are about the Principal and CEO/Head Teacher, speak to the Chair of Trustees. This can include transferrable risks whereby inappropriate behaviour outside of work could affect their professional conduct and the risk can be transferred to the Trust (refer to the Staff Code of Conduct and Whistleblowing Policies).

The Principal and CEO/Head Teacher /Chair of Trustee/Governors will then follow the procedures set out in appendix 3, if appropriate.

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 CEO/headteacher/chair of Trustees, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident that occurred when an individual or organisation was using the Trust premises for running an activity for children, follow the Trust's safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

7.8 Allegations of abuse made against other students

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

Child-on-child abuse usually occurs between young people who are aged under 18. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under our 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 students in the Trust at risk
- Is violent
- Involves students 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, including where generated by AI), which may include or be driven by misogyny/misandry

See Appendix 4 for more information about child-on-child abuse.

Procedures for dealing with a student who discloses they are a victim of child-on-child abuse, sexual violence or sexual harassment

- Parent/ guardian/ carer contacted by the DSLs/DDSLs where safe to do so, regarding the disclosure made
- Parent/ guardian/ carer informed of Trust procedure for reporting to police and MASH
- Following disclosure, police 101 report will be filed by the DSLs/DDSLs
- MASH referral made for any disclosure involving students under 18 years of age at time of disclosed incident or advice sought from MASH team if student is over 18 years of age at time of disclosed incident
- Referral to appropriate external professionals for support
- Continued support with allocated DDSL
- If the victim discloses the alleged perpetrator is a Frontier Learning student we follow the above procedure plus, the DSLs/DDSLs will meet with victim and their parent/guardian/carer to discuss any risk assessment and navigation plan

Procedures for dealing with a student who has been named as an alleged perpetrator child-on-child sexual harassment and sexual violence' by another Frontier Learning student

- A MASH referral will be made regarding being named in police 101 report for any student under 18 years of age at the time of disclosed incident.
- The DSL and allocated DDSL will meet with the student and their parent/guardian/carer to inform them of the report to 101 and MASH
- At the meeting, a risk assessment and navigation plan will be discussed alongside FLT expectations and outcomes depending on the legal outcome following the report made
- Continued support with allocated DDSL is put in place

Creating a supportive environment in the Trust and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate students about appropriate behaviour and consent
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- 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 students who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- 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 student'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:
        - Students 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 student's behaviour might indicate that something is wrong
    - That certain students may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a student harming a peer could be a sign that the student 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 student may be at risk from it
    - That they should speak to the DSLs/DDSLs 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 DSLs will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

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

7.9 Making or sharing of nudes and semi-nudes ('sexting')

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including where generated by AI, you must report it to the DSLs/DDSLs immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the student to delete it

- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSLs/DDSLs responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSLs/DDSLs.

Following a report of an incident, the DSLs will meet with the relevant Trust staff, including the DDSLs, Head of Year etc. This meeting will consider the initial evidence and aim to determine:

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

The DSL/DDSLs will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a student to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any student in the images or videos is under 13
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSLs/DDSLs, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy. The DSLs/DDSLs will conduct a further review to establish the facts and assess the risks, holding interviews with the students involved (if appropriate). If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 17 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Tutorial Programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Students also learn the strategies and skills needed to manage:

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

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

- Putting safeguarding first
- Approaching from the perspective of the student
- Promoting dialogue and understanding
- Empowering and enabling students
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our students

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

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

To achieve this, we will:

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

Students are aware that their main point of contact is their Personal Tutor. However, they are also encouraged to speak with any trusted member of staff if they have any concerns. Additionally, students can raise concerns via the Safeguarding email which is monitored by the DDSLs. Posters providing information and signposting various sources of support are displayed throughout the college.

8. Online safety and the use of mobile technology

FLT recognises that students' use of the internet and mobile phones are an integral part of their education and wider lives. However, we are also aware of the potential risks of harm associated with their use.

The Trust has a Digital and Online Safety Policy which sets out how we minimise these risks across all sites and how we teach students to stay safe when using the internet and mobile phones both in college/school and beyond.

All staff and volunteers are expected to adhere to the IT Acceptable Use Policy at all times and to model safe and responsible online behaviour.

In line with statutory guidance:

- All staff receive regular child protection training, which includes online safety. This training ensures staff understand their responsibilities, the expectations of their role, and how to respond to concerns appropriately.
- The Trust maintains a robust filtering and monitoring system, overseen by the DSLs and DDSLs, to help protect students from harmful content and to identify safeguarding concerns at the earliest opportunity.
- Expectations regarding student and staff use of mobile phones are set out in XXX (code of conduct?) The Trust reviews its approach to mobile phone use in line with safeguarding risks and statutory guidance.
- The Trust sets clear guidelines for the use of mobile phones for the whole community, including the expectation of mobile usage during the school/college day
- Students are taught how to recognise risks online, including those related to social media, online gaming, and sharing personal information, misinformation and disinformation and are supported to make safe and responsible choices.

8.1 Artificial intelligence (AI)

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

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

FLT will treat any use of AI to access harmful content or bully students in line with this policy and Behaviour/Student Code of Conduct/Digital and Online Safety Policy.

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

9. Notifying parents or carers

Where appropriate, we will discuss any concerns about a student with the student's parents or carers. The DSLs/DDSLs 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 DSLs/DDSLs.

If we believe that notifying the parents or carers would increase the risk to the student, 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 students, we will normally notify the parents or carers of all the students involved. We will think carefully about what information we provide about the

other student 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 DSLs/DDSLs 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)

10. Students with special educational needs, disabilities or health issues

We recognise that students with SEND or certain health conditions can face additional safeguarding challenges. Students 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 student's condition without further exploration
- Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
- The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these students. This includes:

- The SENCo is part of safeguarding team who works with the Additional Learning Support (ALS) team to offer support to help students overcome any communication barriers they face.
- Any abuse involving students with SEND will require close liaison with the DSLs/DDSLs and the SENCO/ALS team.

11. Young Carers

- The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

12. Students with a social worker

Students may need a social worker due to safeguarding or welfare needs. We recognise that student'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 DSLs/DDSLs and all members of staff will work with and support social workers to help protect vulnerable students.

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

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

13. Looked-after and previously looked-after children

We 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 DSLs/DDSLs have details of the student's social workers and relevant virtual school heads

Our DDSLS are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The DDSLs are appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the DDSLs:

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

14. Students who are lesbian, gay, bisexual

FLT recognise that students who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other students. See our student code of conduct/behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ students are more likely to experience poor mental health. Any concerns should be reported to the DSLs/DDSLs.

When families/carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice.

15. Students who are questioning their gender

15.1 Supporting students who are questioning their gender

We are aware of the potential vulnerabilities of students who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail. The Trust will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of students and staff in relation to their religion or belief.
When supporting a student questioning their gender, we will take into account the principle of taking a careful approach.
The DSLs/DDSLs will lead in these cases.

15.2 Involving parents/carers in cases of pupils questioning their gender

Where a student who is questioning their gender asks for support from the Trust, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a student at greater risk than not involving them, the DSLs will determine a course of action needed to safeguard the student before contacting parents/carers or any decisions are taken.

Where a student confides in a member of staff about their feelings but does not ask the Trust to make changes to how they are treated, the Trust will only break any confidence if there is a related safeguarding risk.

15.3 Considering requests for support with social transition

The Trust will not initiate any action regarding social transition. However, when a student or their parent/carer requests that the Trust makes changes or puts support in place to facilitate the student presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the student and other students.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the Trust and a student's parents/carers have been involved (as set out in KCSIE).

In making decisions about supporting social transition, the Trust will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the Trusts' evaluation of the welfare and best interests of the student and other students. The Trust will make decisions in line with the following principles:

- The Trust has statutory duties to safeguard and promote the welfare of all students: the first step when considering a students' request for support with social transition will be to consider what is in the best interests of the student and other students, and a decision relating to social transition may not be the same as a student's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the student than not involving them) where a student who is questioning their gender asks for support from the Trust parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the Trust will take a very careful approach: social transition is an active intervention that may have significant effects on the student in terms of their psychological functioning and longer-term outcomes
- The Trust will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The Trust will ensure that the decision-making process is documented and records are kept.

The circumstances or needs of a student may change over time, and the Trust may need to review its original decision and will involve the DSLs in doing so.

15.4 Rules on single-sex spaces

Students are not allowed into toilets, changing rooms, or showers designated for the opposite biological sex, with no exceptions.

15.5 Rules on single-sex sports

The Trust may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The Trust can separate students according to their biological sex in these circumstances.

Where single-sex sports are implemented for safety reasons, there are no exceptions and students must not be allowed to participate in sports designed for the opposite sex.

16. Complaints and concerns about FLT safeguarding policies

16.1 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 (see appendix 3).

16.2 Other complaints

Please see our Complaints Policy.

16.3 Whistleblowing

Please refer to FLT's whistleblowing policy.

17. Record-keeping

We will hold records in line with our 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 DSLs/DDSLs.

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 file for each student and should only be accessed by those who need to see it.

Safeguarding records relating to individual students will be retained for a reasonable period of time after they have left the Trust.

If a student with safeguarding concerns moves to another school or college, the DSLs/DDSLs will ensure that their safeguarding file is forwarded as soon as possible, securely, and separately from the main student file.

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

18. Training

18.1 All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the Trust wide safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all students

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify students 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, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

18.2 The DSLs/DDSLs and the wider Safeguarding Team

The DSLs/ DDSLs and the Safeguarding Team will undertake 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 workshops, 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.

18.3 Trustee/Governors

All trustees/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-Trust approach to safeguarding

As the Chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the CEO/ Headteacher, they receive training in managing allegations for this purpose.

18.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the Trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

19. Monitoring arrangements

This policy will be reviewed **annually** by the DSLs/DDSLs. At every review, it will be approved by the CEO and the Trustees.

Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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 2: Safer Recruitment and DBS checks – Policy and Procedures

Safer recruitment policy

All staff including agency staff and volunteers working with students in our Trust will be recruited safely and in accordance with **part 3 of Keeping Children Safe in Education (KCSIE) 2026**. This will include questions at the interview stage by the Principal/CEO, Headteacher or SLT member either in person or through Teams. As part of due diligence, online searches will be conducted on the shortlisted candidates via an online search engine.

All vacancies are considered in the context of safeguarding ensuring that the responsibility to safeguard students is clearly stated within the requirements of the role. The knowledge, skills and experience required to safeguard students is included within a person specification.

Advertising

All vacancies are advertised in a manner that is likely to attract a wide range of suitable applicants. The advertisement will always include a statement about our commitment to safeguarding and our expectation that all applicants will share that commitment. The advertisement will state that the post is subject to an enhanced Disclosure and Barring check.

Applications

The application form will be used to enable the gathering of information about the candidates' suitability to work with children and vulnerable adults by asking specific and direct questions. All completed application forms will be scrutinised. CV's are not accepted as part of the application process in order that the process of selection remains consistent and applicants are all considered using the same format through the Trust's standard application.

All shortlisted candidates are asked about any a criminal conviction, reprimand, or cautions on application forms and shortlisted candidates are also required to complete and return self-declaration form indicating whether they have a criminal conviction, reprimand, or caution which also informs them about online searches. The self-declaration is only read if the candidate has been offered the job role, if not, these are unread and destroyed.

References

Open references or testimonials **will not** be accepted. Two recent employers will be contacted for references one of which must be from the current Principal/CEO or Headteacher. No appointment will be made without references. Specific questions about the candidate's previous employment or experience of working with children and vulnerable adults will be asked including whether there were any safeguarding, disciplinary or capability concerns. Any vague or ambiguous statements or gaps in employment will be investigated thoroughly.

Interviews

All interviews will be conducted face-to-face. The interview panel will always contain at least one member trained in safer recruitment practice. The interview questions will seek to ensure a thorough understanding of the candidate's values and beliefs that relate to students and young people is captured.

If any criminal disclosures have been made, the Principal/CEO or Headteacher will discuss this with the candidate.

Appointments

An offer of appointment will be conditional upon clearance of all employment checks including enhanced DBS checks and completed references. All candidates will be required to bring original documents which confirm their identity, qualifications, and right to work. Queries will be made about online and social media presence if any incidents or issues were identified.

Any person whose checks reveal that they have sought work when barred from working with children or vulnerable adults to the Disclosure and Barring Service will be made. All staff employed by FLT as well as all Governors and Trustees will be recorded on the Single Central Record. The SCR will also include all workers such as contractors, agency staff, volunteers and visitors.

Induction

Newly appointed staff will receive appropriate guidance about safe working practice, boundaries and propriety and explain the consequences of not following the guidance and will complete safeguarding training.

Safe Practice

All adults working in or on behalf of FLT have a duty to safeguard **all** students and promote their welfare. We aim to provide a safe and supportive environment for our students through the relationship we have with them and their parents, guardians and carers and will always seek to ensure that all adults working in The FLT behave in a manner that fosters this relationship.

All staff are aware of and have clarity about the expectations FLT sets as the standards of their behaviour towards all students and that any incident that falls below expected standards will be responded to appropriately.

Dismissal

Any member of staff who is dismissed because of misconduct relating to a student will be referred to the Disclosure and Barring Service.

Existing staff

New members of staff are vetted and pre-employment checks are completed. In certain circumstances, existing staff may be re-vetted:

- There are concerns about an existing member of staff's suitability to work with children. This would be in the form of social media checks and, if they're not on the DBS online update service, a new DBS would be conducted; or
- There has been a break in service of 3 months or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or young person where:

- We believe the individual has engaged in 'relevant conduct'; or
- We discover that an individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or young person or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

All existing staff in a management position will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).

Third Party Agency

We will obtain written notification from any agency that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check in person that the person presenting themselves for work is the same person on whom the checks have been made by evidence of a passport or other appropriate photo ID.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the Trust has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will conduct the DBS check for self-employed contractors who do not possess a DBS check.

We will not keep copies of DBS certificates for longer than 6 months.

Service Level Agreements will be checked for all agency and contractors to ensure awareness and compliance with our safeguarding regulations.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment in the absence of a DBS check to ensure they are supervised at all times by the liaison member of staff if engaging in regulated activity. We will retain a record of this risk assessment

Governors and Trustees

All Trustees and local governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. All trustees and governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Agency staff, contractors and volunteers who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. A risk assessment will be conducted in the absence of a DBS check to ensure that the liaison member of staff is supervising the individual and access to systems are restricted until the DBS check is complete.

We will check the identity of all these individuals on arrival at the Trust.

Adults who supervise students on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect students from harm.

Students staying with host families

Where the Trust makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will work with a UK based travel agency who follows the guidelines set out by School Travel Forum.

Where the Trust is organising such hosting arrangements overseas and host families cannot be checked in the same way as in the UK, we will work with our travel agency and partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: Allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: 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 student, or may have harmed a student, and/or
- Possibly committed a criminal offence against or related to a student, and/or
- Behaved towards a student or students in a way that indicates they may pose a risk of harm to students, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with students – this includes behaviour taking place both inside and outside of the Trust

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 Principal and CEO/Head Teacher, or the Chair of Trustees where the Principal and CEO/Head Teacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

If we receive an allegation of an incident happening while an individual or organisation was using the Trust 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

We would consider suspension of the accused until the case is resolved, where appropriate.

Suspension of the accused would not be the default position and would only be considered in cases where there is reason to suspect that a student or other students is/are at risk of harm. 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 Trust so that the individual does not have direct contact with the student or students concerned
- Providing an assistant to be present when the individual has contact with the student
- Redeploying the individual to alternative work in the Trust so that they do not have unsupervised access to students
- Moving the student or students 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 other work for the Trust

If in doubt, the case manager will seek views from the Trust's HR Manager/SFCA advisor 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 that 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:

- 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 designated officer at the local authority. 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 students at the Trust 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
- 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 designated officer. 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 Trust 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 designated officer to initiate the appropriate action in the Trust 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.
- Inform the parents or carers of the student(s) 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 student(s) 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

If the Trust 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 Trust 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 Trust'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 Trust, 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 our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Trust, while the Trust carries out the investigation
- We will involve the agency fully, but the Trust 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.

- 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 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 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 Trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Trust 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, FLT 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 student(s) who made the allegation, if they are still attending the Trust.

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 student 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 Trust 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 student 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 Trust will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

FLT 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 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 student(s) 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 Trust 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 that 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 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 student 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 Trust 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 Trust
- 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 Trust 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 students
- Having favourites
- Taking photographs of student on their mobile phone
- Engaging with a student on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students

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 as per section 7.7 of this policy
- 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's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the 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

The CEO will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's Saff Code of Conduct. The CEO will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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 and the 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 Trust

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 that would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: 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

Students who are absent from education

It is acknowledged that, as a further education provider, students may be absent from lessons for several reasons, none of which would suggest any risk of harm. However, procedures will help identify any patterns of attendance that indicate potential risk. A student 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 student may be absent or become absent from education, but some students are particularly at risk. These include students 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/college
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with students 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 student leaves the Trust without a new school/college being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a student'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 student 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 isn't possible for a child to consent to being exploited, abused or trafficked) 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 student:

- 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 absent from education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSLs/DDSLs. The DSLs/DDSLs 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/DDSLs. The DSL/DDSLs 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-on-child abuse (including harassment and violence)

Child-on-child abuse usually occurs between young people who are aged under 18. Anyone who is a student in our Trust community may be affected. Child-on-child abuse may include physical abuse, sexual, emotional abuse, relationship abuse, exploitation, all types of bullying, sexual harassment etc. This can occur both in person and online, in or outside of the Trust. Our students may be both victims and perpetrators.

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

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) including those generated using AI
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a student makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about FLT's approach to this type of abuse.

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) 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 students 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.

Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the Trust before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for information sharing.

The DSLs/DDSLs will provide support according to the student's needs and update records about their circumstances.

Homelessness

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

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

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

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

So-called 'honour or faith-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 student being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSLs/DDSLs, 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.

Section 7.3 of 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 student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student 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 college, 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 student 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 college
    - 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 student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSLs/DDSLs.

The DSLs/DDSLs will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to access relevant support

Preventing radicalisation

- 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 and colleges have a duty to prevent children from becoming involved with or supporting terrorism. The DSLs/DDSLs 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 students in the Trust 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 students to stay safe online on site 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 students' behaviour.

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

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

Students 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 student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSLs/DDSLs.

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

Harmful sexual behaviour, sexual violence and sexual harassment between students in college

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

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

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

- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

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

HSB can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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

When supporting victims, staff will:

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

Some groups are potentially more at risk. Evidence shows that girls, students with SEN and/or disabilities, and lesbian, gay, bisexual or transgender (LGBT) students are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a student makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about FLT's approach to this type of abuse.

Serious violence

Serious violence is a continuing safeguarding concern which may involve:

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

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

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

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

- Being male
- Having been frequently absent or permanently excluded from school/college
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSLs/DDSLs.

Visitors and Guest Speakers

We value the opportunities presented by external speakers for students to experience diverse opinions and to enter debates. This is seen as an essential part of both personal and academic development. All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the Trust any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using our facilities is not seeking to disseminate extremist views or radicalise students or staff.

Visitors to the Trust who are visiting for a professional purpose, such as educational psychologists, guest speakers, social workers etc. will be asked to show photo ID and:

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

Any organisation requesting to distribute leaflets on campus must seek approval from the DSL prior to distribution. Other than the promotion of Trust business, staff and students must also request the permission of the DSL before distributing leaflets.

For further information please refer to the Visiting Speakers Policy.

All visitors are required to report to Reception, including contractors and volunteers, and are asked to sign in and are given an identity badge to confirm that they have permission to be on site. Furthermore, the identity of contractors will be checked upon arrival. The Single Central Record is maintained to ensure that all appropriate staff, volunteers, Trustees, Governors, agency staff and contracted staff in Regulated Activity are entered on it.

Appendix 5: Full legislation and statutory guidance

This policy is also based on the following legislation:

- 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 students at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our Trust to take positive action to deal with particular disadvantages affecting a specific group of students (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at

risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination

- Operation Encompass statutory guidance, which explains that the police must notify our school of any incidents involving domestic abuse

This policy also complies with our funding agreement and articles of association.