

New Education Trust

Bengeworth Academy

Bretforton Village School

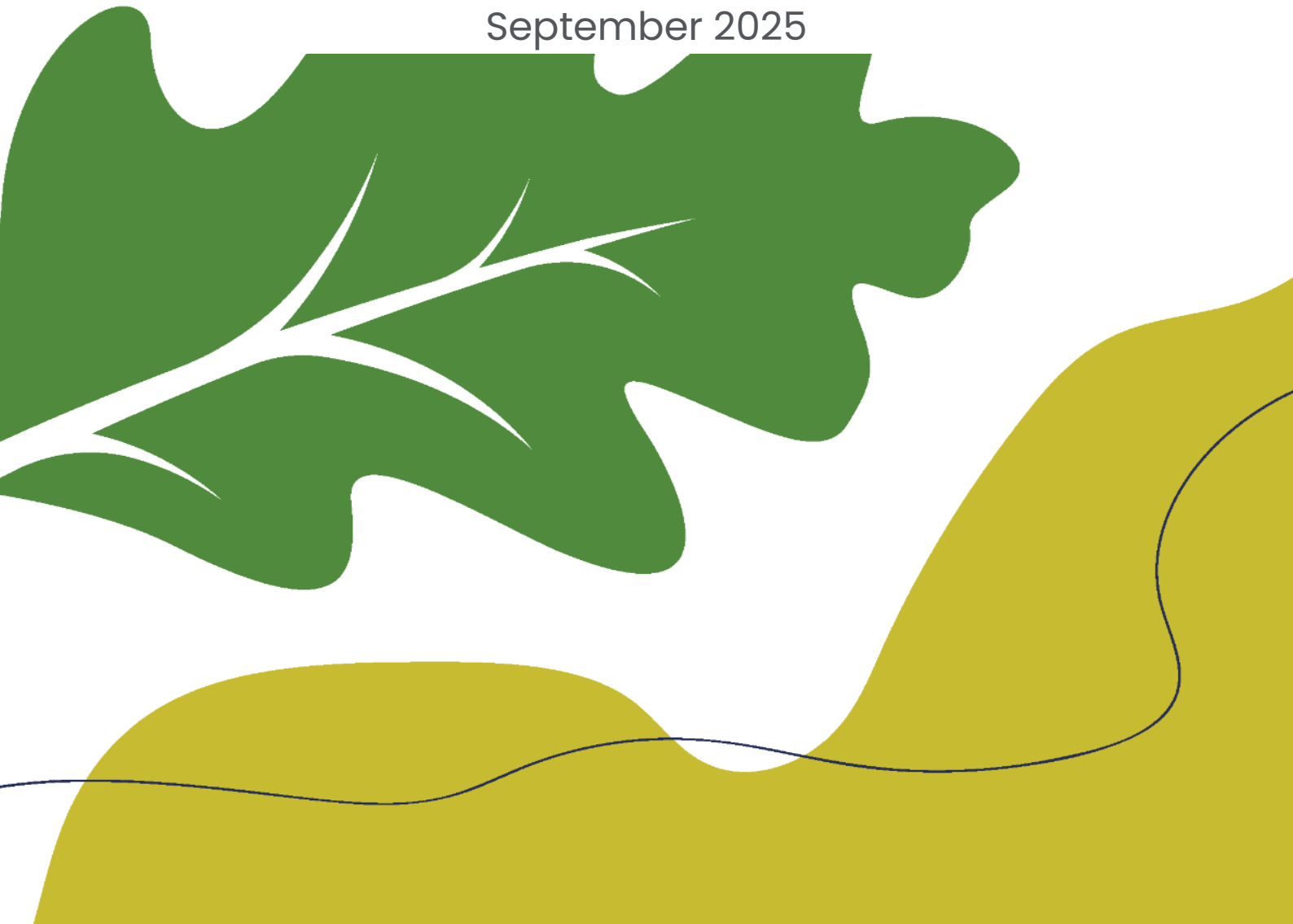
Church Lench CE First School

Safeguarding policy

including Child Protection

2025-2026

September 2025



This policy is reviewed at least annually by the governing body and was last reviewed on 1st September 2025

Next review date – 1st September 2026

New Education Trust Safeguarding Children Policy

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Section 1

In New Education Trust, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child Protection forms part of each school's safeguarding responsibilities.

New Education Trust's Safeguarding and Child Protection Policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2020 Education Act, The Education (Independent School Standards) Regulations 2014 (for independent schools), the Non-maintained Special Schools (England) Regulations 2015 (for non-maintained special schools) and the guidance contained in [Working together to safeguard children - GOV.UK](#) the DfE's statutory Guidance and [Keeping children safe in education 2025](#)

Key Personnel

The personnel responsible for safeguarding in each school within New Education Trust are listed in Appendix C in this policy .

Section 2 Safeguarding is Everyone's Responsibility

This means that safeguarding and promoting the mental, emotional, and physical welfare of children and young people is a fundamental priority for all who work or volunteer in New Education Trust. Consequently, anyone who comes into contact with our children and young people has a role to play in safeguarding and child protection.

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses, but is not limited to, issues such as:

- Staff conduct.
- Health and safety.
- Bullying.
- Child-on-child abuse.
- Sexually harmful behaviour.
- Provision of intimate care.
- Building security.
- Alcohol, drugs, and substance misuse.
- Positive behaviour management.
- Physical intervention and restraint (reasonable force).
- Online safety

This policy should be followed and adhered to in all situations and circumstances when the safeguarding of our pupils is at stake. In accordance with the relevant law and guidance, this policy sets out our procedures for safeguarding and child protection. It applies to all New Education Trust temporary staff, contractors, and agency supply staff as well as volunteers working in our setting.

Our trust recognises that some children are living in circumstances that may make them more vulnerable to abuse, neglect, or poor outcomes. Some may need early help or intervention from other organisations to overcome problems and keep them safe. Appropriate consideration is made for Looked After Children and/or those with Special Educational Needs or Disabilities.

New Education Trust will follow the threshold guidance of [Worcestershire County Council Multi Agency Levels of Need](#) and implement their systems and protocol for referring families for early help and reporting child protection concerns. DSLs will ensure that all staff are aware of those issues and systems for reporting and provide local safeguarding updates.

Contextualised Safeguarding concerns

In our schools, we must ask, 'what are we protecting our children from' and consult with the Local Authority, Staff and Pupils for their views. This means that in our school all staff will be made aware of specific issues relating to locality that could impact on the safety of children. We will ensure all staff receive regular safeguarding briefings to keep them up to date and have the opportunity to share community issues that may impact our children. This information will also be considered within the curriculum planning of PHSE/RSE.

- [Home | Police.uk](https://www.home.police.uk)

Training

- All staff must complete safeguarding and child protection training as part of their induction.
- All Staff must receive annual safeguarding training and regular safeguarding local area updates.
- The DSL team will be appropriately trained and demonstrate attendance at Local Authority and Multi-agency Safeguarding Arrangements meetings.
- The DSL and Deputy Safeguarding Leads will also attend local authority led network meetings and relevant training as per KCSIE 2025 for their required CPD.
- The DSL will share local contextual safeguarding issues through staff briefings.

All New Education Trust staff attend annual safeguarding update training at the start of the academic year. This is delivered in person. Staff unable to attend must access training resources and sign to say that they have read and understood this.

Child Protection and Child Abuse

Child abuse exists where children have been physically or emotionally abused, including severely neglect. This abuse can include all aspects of Child Criminal Exploitation including Sexual Exploitation, County Lines and Modern-Day Slavery. The abuse of children who attend our schools are likely to be noticed by staff, Health Workers or other professionals who come into contact with our pupils. It is essential, therefore, that all those whose work bring them into contact with children and their families are trained to recognise abuse from within families or extra-familial risk. This means that in our schools, we will all know the signs of child abuse and we are aware of the procedures that must be followed to safeguard the child and any siblings. For those students with additional needs or who identify as LGBTQ+, we acknowledge the increased safeguarding issues that can occur and will put in place additional pastoral support and attention, along with ensuring any appropriate support for communication is in place. Our schools have the role of recognising and responding to potential indicators of abuse and neglect, all necessary action should be taken by those with statutory powers to help the child. Early

contact and close liaison with such agencies are therefore regarded as essential by each school.

Our Staff who work directly with children, and young people will read: KCSIE 2025 Part 1 & Annex B. Our Staff who do not work directly with children and young people will read: KCSIE 2025 Annex A. Our governing body/trustees will read Part 2 of KCSIE. We will keep records to evidence this action within our schools.

In the event of an actual or suspected case of child abuse by any adult, including parents, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as an immediate action. A qualified DSL will be available to discuss any safeguarding concerns and take appropriate steps to ensure the child's safety. The DSL is responsible for ensuring that children are identified, and the appropriate agency is involved.

All our staff use *the CPOMS system* to record their concerns about a child but will also discuss their concerns with the DSL. The DSL will be a member of school Senior Leadership Team in each school, and the role will be referenced in their job description. During term time and normal school hours, a DSL will always be available in each school. For the majority of time, this will present as a DSL being on site.

The DSL will attend any reviews called by the Local Authority and may call on appropriate members of staff for reports.

It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed following the correct procedure to enable an investigation to take place. In exceptional circumstances during normal school hours, and for after-school provision, access to the DSL may be by a phone or by text. This will be clearly displayed for easy access.

Safeguarding and child protection concerns should be risk assessed when planning any off-site or residential visits. In each school, a list of those students taking part in any trip will be passed to the DSL to ensure that staff are made aware of all essential information relating to the students in their care.

The DSL and DDSL at each school will meet on a regular basis to confidentially discuss pupils who are identified as vulnerable. This will be to assess the levels of support and intervention required and to ensure those most vulnerable are contacted when absence is unauthorised or otherwise agreed as part of a plan or placement. Staff will try all available contact numbers for family members including emergency contacts. Unanswered calls will be reassessed by the DSL with further discussion with the safeguarding team to consider the next steps such as home visit.

Section 3 Our Commitment

In New Education Trust, we recognise that because of the day-to-day contact with children and young people, staff and volunteers are well placed to observe signs of harm, abuse, neglect, peer-on-peer abuse, victimisation and /or exploitation. We recognise that pupils may not be ready to talk about their experiences of abuse, exploitation, or neglect as they do not see this as harmful. Therefore, we will ensure arrangements are in place to safeguard and promote the welfare of children by:

- Creating a culture of safeguarding by embedding robust policies and procedures where all children feel secure, are encouraged to talk, and are listened to.
- Maintaining a 'Zero Tolerance' to child-on-child abuse, IT CAN HAPPEN HERE ETHOS. Including sexually harmful behaviour, racism, and homophobia ([New Education Trust anti-bullying policy](#))
- Ensure all children and young people know the adults in our schools who they can approach if they have worries.
- Teaching students to keep themselves safe from all forms of abuse, including: child sexual exploitation, criminal exploitation, female genital mutilation [FGM Statutory Guidance](#) forced marriage, extremism, radicalisation [Government Channel Guidance](#), and [child-on-child abuse](#).

And we will support our staff by:

- Providing effective, ongoing training and development for all staff.
- Addressing concerns and making robust referrals to other agencies, at the earliest possible stage, including the acceptance of the regulation around mandatory reporting.
- Developing effective links with relevant agencies in all matters regarding safeguarding and child protection, proactively sharing information as early as possible to support pupils and their families.
- Monitoring and supporting children and young people who are subject to child protection plans, contributing to the implementation of the plan.
- Keeping meticulous, written records of concerns about children and young people, even where there is no need to refer the matter immediately (dates, times, person/s responsible and actions) ensuring all records are kept securely. Records will include:
 - A comprehensive summary of concerns.
 - Details of the concern.
 - What action was taken and any follow-up.
 - Actions taken and outcomes.
- Ensuring the suitability of all staff through safe recruitment practice.

- Ensuring all our staff and volunteers understand their responsibilities with regard to safeguarding and child protection through annual training and CPD training events.
- Ensuring that parents and carers understand the responsibility placed on New Education Trust and its staff for safeguarding and child protection.
- Maintaining awareness of those children and young people who are persistently absent or missing from school, notifying the local authority in line with 'Children Missing in Education' protocols
- Maintaining clear procedures for reporting Low Level Concerns and allegations against staff members.

We recognise that children and young people who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame. Our schools may be the only stable, secure, and predictable element in the lives of children at risk. Our schools will support all children through:

- Appropriate staff conduct, in line with the policy.
- Relevant curriculum design and implementation to teach pupils about staying safe at all times, including when they are online.
- Daily practice underpinned by our school ethos, vision, and values.
- Consistent implementation of Health & Safety, Anti-bullying, Safer Recruitment, Behaviour and Online safety policies and related practice.
- Close and proactive liaison with other agencies such as social services, Child and Adult Mental Health Service, the Education Welfare and Psychology Services.

In line with Government guidelines in KCSIE 2025, our schools will where reasonably possible, hold two or more emergency contact numbers per pupil or student. This provides the schools with additional options for contacting a responsible adult when a child is missing school and is also identified as a welfare and/or safeguarding concern.

Section 4 – Child-on Child Harmful Sexual Behaviour

It is important that our school staff can recognise that children are capable of abusing their peers, and that this abuse can include physical abuse, sexting, initiation/ hazing, sexual violence, and harassment.

It should be recognised that there is a gendered nature to child-on-child abuse, i.e., that it is more likely that girls will be victims and boys' perpetrators.

Each school's values, ethos and behaviour policies provide the platform for staff and students to clearly recognise that abuse is abuse and it will never be tolerated or diminished in significance.

Schools should recognise the impact of sexual violence, and the fact children/young people can, and sometimes do, abuse their peers in this way. It can happen both inside and outside of our schools.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- sexual "jokes" or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos, or drawings of a sexual nature.
- up skirting (this is a criminal offence); and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

When referring to sexual violence this policy is referring to [sexual offences under the Sexual Offences Act 2003](#) as described below:

- **Rape:** A person (A) commits an offence of rape if: there is intentional penetration of 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, anus, or mouth 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

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. Consent 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.

Sexting (the consensual and non-consensual sharing of nude and semi-nude images and;/or videos) it will be dealt with seriously within our schools.

How we will support

- In our schools, we will not tolerate incidences of child-on-child abuse. And will not pass it off as “banter” “just part of growing up” “or “just having a laugh.”
- Regardless of whether incidents are reported or not, we will lead a culture of it could happen here.
- All incidences will not be tolerated and will be taken very seriously.
- We will always challenge behaviours which create a hostile, intimidating, or degrading environment.
- We will follow both national and local guidance and policies to support any children/young people subject to child-on- child abuse, including sexting (also known as youth produced sexual imagery) and gang violence.
- We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools.
- We will always report episodes of ‘up- skirting’: Up-skirting is typically defined as taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- We will consider the support required by those falsely accused of child-on-child abuse.
- All disclosures will be taken seriously with those making the disclosure, kept safe, their anonymity protected when appropriate, and ensuring pupils will never be made to feel like they are creating a problem for reporting abuse.

- We will consider taking positive action to support a specific group of children and young people if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. We will ensure staff are aware of how these experiences can impact on a child's mental health, behaviour, attendance, and progress at school.

Section 5 Emotional Health and Well-Being and Mental Health Support

We are aware that mental health problems can, in some cases, be an indicator that a child or young people has suffered or is at risk of suffering abuse, neglect or exploitation.

Each school has an important role to play in supporting the mental health and wellbeing of all our learners. This means that in our schools we will: Ensure that all of our staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We will consider the impact of adverse childhood experiences (ACES) and acknowledge that these can have a lasting impact throughout childhood, adolescence and into adulthood.

As a trust, we ensure we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

- Each school has a trained Senior Mental Health Lead who can advise about mental health concerns.
- Each school uses the Emotional Literacy Support programme to support specific mental health concerns and needs.
- There is a team of Mental Health Ambassadors who can respond to low-level concerns and also alert teachers when there are concerns in the student body.

As schools, we will be vigilant for signs of emotional well-being concerns. These may include:

- Physical signs of harm that are repeated or appear non-accidental.
- Changes in eating/sleeping habits.
- Increased isolation from friends or family, becoming socially withdrawn.
- Changes in activity and mood.
- Lowering of academic achievement.
- Talking or joking about self-harm or suicide.
- Abusing drugs or alcohol.
- Expressing feelings of failure, uselessness, or loss of hope

We ensure our pupils are supported to have the skills and understanding to keep themselves and others physically and mentally healthy and safe. This is part of our development of our RSE and PSHE curriculum.

It is also key that we train our staff to be aware of how these children's experiences, can impact on their mental health, behaviour, and education.

- Staff received regular training to make them aware of the key signs of a mental health concern.
- There are opportunities for staff at all levels to discuss mental health concerns with the Senior Mental Health Lead.
- Content of PSHE lessons in our schools will be determined by the specific needs of our pupils There will always be an emphasis on enabling students to develop skills to seek help for themselves and others.
- DSL will liaise with Children Social Care to ensure that the appropriate approach is taken to safeguarding children most at risk.

School staff may become aware of warning signs which indicate a student, or a member of staff, is experiencing mental health or emotional wellbeing issues.

These warning signs should always be taken seriously.

If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action should be taken.

In our schools, we will work closely with parents and carers to support the whole family, unless to do so places the child at additional risk.

We will provide clear means for parents to contact the Senior Mental Health Lead if they have further questions and arrange a follow up meeting or phone call as parents often have many questions as they process the information.

To support parents and carers at the end of each meeting we will agree on the next steps and always keep a brief record of the meeting on the child's CPOMS file.

Section 6 Opportunities to Teach Safeguarding

Children are taught about safeguarding in our schools. The following areas are among those addressed in **PSHE/RSE** and in the wider curriculum.

Our schools plays a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, hate focused on LGBTQ+ issues and sexual violence/harassment.

These will be underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regular timetabled lessons and reinforced throughout the whole school curriculum.

Our curriculum delivery will be fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of our children and young people with SEND and other vulnerabilities) and will stress that law around safeguarding is to protect not criminalise them.

The curriculum will tackle at age-appropriate stages issues such as:

Bullying/Cyber Bullying

- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- Online safety curriculum – CEOP resources, Education for a Connected World curriculum;
- School values of Respect, Responsibility, Friendship, Trust, Perseverance and Forgiveness taught and explored;
- Bible stories – Open the Book/RE curriculum;
- Teaching/understanding the pupil anti-bullying policy;
- Playground leaders and buddy benches;
- 'Talk About'/Social skills interventions and groups;
- LOfC – conflict resolution;
- Anti-bullying week.

Drugs, Alcohol and Substance Abuse

- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- External visitors – police, school nurse, paramedics;
- Science curriculum.

Online Safety / Mobile technologies

- Online safety week campaign;
- CEOP/Thinkuknow resources at age appropriate level;
- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- DfE guidance – ‘Teaching Online Safety in Schools’;
- Education for a Connected World framework;
- Childnet resources – e.g. Smartie the Penguin, Digiducks’ big decision;
- Be Internet Legends resources;
- BBC Webwise resources;
- Twinkl resources;
- Specific bespoke lessons for online safety

Stranger Danger

- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- Reinforced policies and procedures about keeping children safe in school explained to all pupils frequently;
- Procedures taught to pupils for LOtC/Educational Visits;
- Bible stories – Open the Book/RE curriculum;
- Pupils taught to challenge and report any adult in school not wearing a Bengeworth lanyard;
- Year group topics e.g. ‘People Who Help Us.’

Fire and Water Safety

Fire:

- At least termly fire drills with associated teaching about procedures and expectations/how to keep safe in a fire;
- Reception topic – ‘People Who Help Us’, visit to fire station, visits from firefighters;
- Y2/3 topic – ‘Great Fire of London’, burning of houses and firefighters demonstrating how to put fires out;
- Design/Food Technology – safety in the kitchen and fire danger;
- LOtC/Forest School – lighting and extinguishing fires, cooking on an open fire, fire safety;
- Science curriculum – flammable materials;

Water:

- Swimming – Year 2 to Year 5 – all sessions start with emergency procedures, water safety drill and getting out of the water safely;
- Local LOtC/Educational visits to River Avon;
- Reception/Year 1 topic – ‘Grace Darling/RNLI’.

Child on Child Abuse

- School values – particularly Respect, Responsibility, Friendship, Trust, Forgiveness taught and explored;
- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- ‘Kind hands and feet’ taught through the school from Reception;
- Bible stories – Open the Book/RE curriculum;
- LOtC – conflict resolution;
- ‘Talk About’/Social skills interventions and groups.

Sexual Violence and Sexual Harassment

- Science curriculum Reception/Year 1 – correct names of body parts;
- NSPCC presentations;
- Year 4 and 5 – RSE curriculum;
- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- Online safety curriculum (as above).

Road Safety

- Road safety taught and reinforced before every LOtC session/Educational Visit – e.g. walking to Church, around the village;
- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- Active Eco-Team campaigns addressing parent/carer poor parking;
- Bikeability (Year 4 and 5);
- Reception – The Listening Project;
- Reception pupils taught the importance of wearing hi-viz jackets;
- Walking to and from school policy expectations and arrangements explained to Year 5 pupils.

Domestic Abuse

- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- Planned continuous provision opportunities/role play to reinforce positive relationships;

- Focus on Behaviour Policy – understanding that there should be ‘kind hands and feet’.

Healthy Relationships / Consent

- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- Social stories (age-appropriate);
- ELSA groups;
- Planned continuous provision opportunities/role play;
- School values – particularly Respect, Responsibility, Friendship, Trust, Forgiveness taught and explored;
- LOTC – taking risks and responsibilities, team work building, conflict resolution;
- RE curriculum and topics, Bible stories and Open the Book assemblies to teach healthy relationships;
- NSPCC PANTS rule and appropriate touch.

So called Honour Based Violence issues (HBV) e.g. Forced Marriage, Female Genital Mutilation (FGM)

- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- School values of Respect, Responsibility, Friendship, Trust, Perseverance and Forgiveness taught and explored;
- Social stories;
- Understanding consent taught;
- Relationships and Sexual Education curriculum.

Child Exploitation

- PSED/PSHE/Circle time curriculum, including resources from the PSHE Association scheme of work;
- NSPCC ‘PANTS’ rule;
- Online safety lessons focussing on talking to others online and how to keep safe;

<https://www.gov.uk/government/publications/promoting-fundamental-british-values-through-smisc>

Extremism and Radicalisation

(in line with the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)¹.

- School values of Respect, Responsibility, Friendship, Trust, Perseverance and Forgiveness taught and explored;
- PSHE/PSED and Spiritual Reflection opportunities;
- Differences and tolerance taught through Christian stories in Collective Worship and Open the Book assemblies; e.g. The Good Samaritan;
- Multi-cultural topics taught across the school;
- Community visitors from different faiths and backgrounds;
- LOtC/Educational visits linked to other cultures and to places of worship;
- RE teaching and curriculum: other faiths taught and compared.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

Section 7 Online safety Filtering and Monitoring

It is essential that children are safeguarded from potentially harmful and inappropriate communications and online material. As such, each school ensures appropriate procedures, filters and monitoring systems are in place in accordance with the following policies:

- **Example**
 - E-Safety Policy.
 - Acceptable use of Technologies.
 - Web Filtering and Device Monitoring through SurfProtect.
 - Audit of effective filtering through weekly filter reports to the DSL.

We recognise that the online risks fall into 4 main categories:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **commerce:** – risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures including how online safety is reflected in other relevant policies. We consider online safety whilst planning the curriculum, any teacher training, the role, and responsibilities of the DSL and engaging with parents to raise awareness in order to support their children and young people.

The DSL will take lead responsibility for online safety and understanding the filtering and monitoring systems in place. All staff will receive appropriate online safety training which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

The DSL will oversee the delivery of the e-safety curriculum ensuring safeguarding is maintained.

- Online safety is included our curriculum provision as part of providing a broad and balanced curriculum.
- School iPads will have the Safer Schools app installed and activated.
- Children are taught about safeguarding, including online, through teaching and learning opportunities, with specific reference to the age-related guidance.

Technology, and the risks and harms related to it evolve and changes rapidly. We will carry out an annual review of our approach to online safety that considers and reflects the risks pupils face. The use of Artificial Intelligence (AI) is a new and developing field and the implications within safeguarding will be closely monitored over the next year and the appropriate response will be led within each school to have the appropriate level of security protection procedures in place in order to safeguard our systems. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. To support this we use [National Education Network](#). In addition to this we access support from [Cyber security standards for schools and colleges.GOV.UK](#).

Mobile phone is limited within our schools. Mobile phones are not to be used in the Early Year classroom. Staff should not use their own device for photography.

Filtering and Monitoring

Our governing body are responsible for, and need to ensure the limit of children's exposure to the above risks from the school's IT system.

Our governing body will

- ensure our schools have appropriate filters and monitoring systems in place and regularly review their effectiveness.
- Through training in line with KCSIE 2025 ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- We also consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

In our schools, we monitor the results of our web blocking and monitoring software to ensure that our students work safely and are protected from terrorist or extremist material, cyber-

bullying, cyber-crime, sexting, offensive user/trolling, vulnerable user over sharing and grooming.

We will follow the DfE filtering and monitoring standards to:

- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.

We meet the Government Cyber security standards for schools and colleges identifying and assigning roles and responsibilities for filtering and monitoring.

We also ensure that all staff:

- understand their role.
- are appropriately trained.
- Follow policies, processes, and procedures.
- act on reports and concerns.
- DSL reviews standards and discuss with IT staff or service providers what more needs to be done to support us in meeting the required standards.
- All staff will work to clear guidance ensuring safe and effective online learning

Section 8 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Criminal Exploitation Child Criminal Exploitation is a coverall heading for the following issues:

- Child Sexual Exploitation.
- County Lines.
- Child Trafficking & Human Slavery.

We will view children (0-18 years) as victims of Child Criminal Exploitation and not as perpetrators and will advocate for our students to be viewed as children in all circumstances, avoiding the adultification of older students.

Child Sexual Exploitation (CSE) CSE involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. It is a problem that occurs for boys as well as girls.

Sexual exploitation can take many forms ranging from the completely inappropriate 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

County Lines Gangs use children and vulnerable people to move drugs and money. Gangs establish a base, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing.' One of the key factors found in most cases of County Lines is the presence of some form of exchange (e.g., carrying drugs in return for something). Where it is the victim who is offered, promised, or given something they need or want, the exchange can include both tangible (such as money, drugs, or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

If staff suspect that a child is a victim of County Lines exploitation, they must follow the trust procedures for reporting child protection concerns and report to the DSL immediately. The DSL should refer to the Worcestershire levels of need guidance to assess if a referral to

Worcestershire County council family front door is required. Additionally to this to seek to complete a GET SAFE risk assessment [Get Safe | Worcestershire County Council](#) immediately and share any further intel with West Mercia police.

Child Trafficking & Human Slavery

Our schools will ensure we keep up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation and access support, advice, and resources via GET SAFE, Worcestershire County council multi agency exploitation team.

Children Missing from Education

Our schools will inform the local authority where a child or young people is missing from education and or absence is irregular. We will provide information to the local authority when removing a child from school roll as per local Worcestershire County council and statutory guidance:

- [Statutory guidance children missing in education](#)
- [Attendance and Children Missing Education \(CME\) | Worcestershire County Council](#)

Elective Home Educated

We will inform Worcestershire County council all deletions from our admission register when a child is taken off roll.

Where a parent/carers has expressed their intention to remove a child from school with a view to educating at home, we will work together to coordinate a meeting with parents/carers where possible to enable informed decisions are being made in the best interests of children. Where a child has additional vulnerabilities we will assess the impact to risk that elective home education may add, and collaborate with partners and parents to ensure this is fully understood and informs assessments or plans.

Homestay Exchange Visits School

Arranged Homestays in UK. Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of

the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults. Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household. School-arranged

Homestays Abroad

Schools with the multi-academy trust will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. Schools in the trust will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately Arranged Homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement, and the school is not the regulated activity provider.

Violence against women and girls including Honour-Based abuse (including Female Genital Mutilation and Forced Marriage)

Where HBA affects children and young people it is a child protection issue. It is an abuse of human rights.

Children and young people who suffer Honour Based Abuse are at risk of Significant Harm through physical, sexual, psychological, emotional harm and neglect. In some cases, they are also at risk of being killed. Some reasons that have been given for HBA are:

- Protecting family 'honour' To control un-wanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual, or transgender).
- Strengthening family links.
- Protecting perceived cultural and/or religious ideals.

- Preventing unsuitable relationships. • Assisting claims for residence and citizenship in the UK.
- Perceived immoral behaviour e.g., make-up or dress; use of mobile phone; inter faith relationships

Our staff in New Education Trust schools have received appropriate training and where we identify HBV the DSL will refer to Children’s Social Care, the Police, and the National Forced Marriage Unit promptly.

[The right to choose: government guidance on forced marriage](#)

FGM mandatory reporting duty for teachers

FGM is a criminal offence – it is child abuse and a form of violence against women and girls and therefore should be treated as such. In our schools we ensure:

Our staff are supported to talk to families and local communities about sensitive concerns in relation to their children and to find ways to address them together wherever possible. All staff are up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation. mandatory reporting requirement in respect of female genital mutilation (FGM).

FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. Four types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris.
- Type 2 Excision – partial/total removal of clitoris and labia minora.
- Type 3 Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia.
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising, and scraping the genital area.

When a teacher suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged under 18, that teacher has a statutory duty to report it to the Police. Failure to report such cases MAY result in disciplinary sanctions.

Forced Marriage

Staff in our schools understand we could potentially play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), of which focus on the role of schools and colleges. Our staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Section 9 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of gender identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse.’ Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

MARAC

If we identify a victim of domestic abuse being high risk. We will consider a referral to MARAC (Multi Agency Risk Assessment Conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children, vulnerable adults, and the

management of offenders. We will continue to provide help and support to safeguard children. The DSL will usually lead this. MARAC does not replace a referral to children social care.

OPERATION ENCOMPASS

In our schools, we receive Operation Encompass Notifications including any reported to our **(EARLY YEARS SETTING/DELETE WHERE NOT APPLICABLE)**. Operation Encompass highlights that a Domestic Abuse Incident has taken place, and the police have been called. As part of the support, we then offer following these notifications, we ensure that staff maintain a close eye on the child, informing the DSL of any changes with regards to their behaviour, and reporting and recording anything out of the ordinary. Operation Encompass is working well in Worcestershire Schools and Worcestershire County Council successfully send DA notifications to schools. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, they inform Worcestershire County Council, who then inform the school via the DSL, before the child or children arrive at school the following day. This information sharing ensures relevant information about the child's circumstances are received in a timely manner and therefore as a school, we enable support to be given to the child according to their needs.

Section 10 Safeguarding Pupils who are at risk of extremism.

The Prevent strategy aims to stop people becoming terrorists or supporting terrorism. While it remains rare for children to become involved in terrorist activity, our schools recognise some, from an early age can be exposed to terrorist & extremist influences or prejudiced views.

As with other forms of safeguarding strategies, early intervention is always preferable. We are committed to working with the local authority and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of:

- **Extremism** – such as the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- **Radicalisation** – such as the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** – defined as 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 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.

All staff need to be alert to changes in children and young people's behaviour which could indicate that they may need help or protection.

We know children and young people are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from harm. As part of our whole safeguarding approach, we include and consider the following.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 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 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.

Staff will use the Prevent risk assessment and their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. When any member of our staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL (If there is a concern that a child or young person is being radicalised or at risk of being drawn into terrorism refer to Children's Services as with any other safeguarding concern. person) and record their concerns on *CPOMS*. In addition, links with the local Channel lead can be made by the DSL and where necessary, individual cases will be referred to the local Channel Panel [Channel guidance](#). for screening and assessment. We will ensure that the DSL will complete local training on the locality risks, and these will be cascaded to school staff. Further information can be found [here](#).

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff are alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or deputy) making a Prevent referral.

The DSL and any deputies for the setting are aware of local procedures for making a Prevent referral.

Section 11 Allegations Against Staff members and Low-Level Concerns

All our staff are aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the trust's confidential reporting (whistleblowing) policy. The MAT policy can be found [here](#).

Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors. Where the Headteacher is also the sole proprietor, concerns should be reported directly to the Local Authority Designated Officer (LADO). Statutory guidance contains further information on: [The Role and Responsibilities of the Designated Teacher](#)

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers, and contractors), then this should be referred to the Headteacher or principal.

Details of your local LADO are available on this link [Refer to Children's Social Care | Worcestershire County Council](#) If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the low-level concerns policy. The policy is accessible [here](#).

Low Level Concerns

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of a school or college 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children and young people
- having favourites

- taking photographs of children and young people on their mobile phone, contrary to school policy
- engaging with a child or young person on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children or young people

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, behaviour to actions which may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable and enact abuse.

All low-level concerns are recorded on the CPOMS system.

Section 12 Safer Recruitment

Safer recruitment practices are essential part of creating a safe environment for children and young people. We will-

- not allocate start dates to new members of staff until all employment checks have been completed.
- We will keep copies of documents used to verify the successful candidate's identity, right to work and required qualifications in staff personnel files.
- We will ensure that staff and volunteers working at in our schools are suitable to do so as outlined in the Multi-Academy Trust Recruitment Policy. This will include online searches for shortlisted candidates. Our policy is that all volunteers, regardless of their activity, will be subject to a DBS check. Where a volunteer is not working in regulated activity, we will require DBS not including barred list check.
- Copies of documents used to verify the successful candidate's identity, right to work and required qualifications are kept on their personnel file.
- Right to work documents will be kept for two years following the date they left our school but will then be destroyed after the two years. This is as per guidance set out in KCSIE 2025.

Single Central Record

The Single Central Record (SCR) is an important part of each school's commitment to Safeguarding and will be maintained by the school secretary.

All pre-appointment checks are recorded on the school SCR template and is audited on a regular basis *by the Safeguarding Governor in liaison with the Headteacher/DSL*.

Any people accessing a school site will be authorised to do so as follows:

It is expected that all staff, visitors, and contractors will:

- Report to the reception on arrival.
- Provide proof of identity.
- Wear a name badge at all times with lanyards differentiating the groups:
- Staff will use the designated New Education Trust Staff blue lanyard.
- Visitors will wear a red lanyard.

- Governors (who have all been DBS checked) will wear orange lanyards.
- Be made aware of the arrangements for safeguarding, health, and safety.

Section 13 Confidentiality and Record Keeping

Staff, volunteers, and contractors have the responsibility to share relevant information about the protection of children with the DSL, Headteacher, Head of school and potentially external investigating agencies. We take all disclosures very seriously.

If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tell the student sensitively that they have a responsibility to refer the matter to the DSL for the student's well-being. We will seek to reassure our students that the matter will only be disclosed to the DSL, who will then decide on appropriate action. At no time should a staff member promise total confidentiality.

Accurate written notes will be kept of all incidents or Child Protection concerns relating to individual pupils. If a staff member has a safeguarding or child protection concern, they must inform the DSL as soon as possible.

These will be kept on the student's Child Protection file within *the CPOMS system*.

Any external organisation or contractor working at any of our schools is expected to work in accordance with our safeguarding child protection policy. This will be shared upon arrival with. Any external individual must report safeguarding concerns to the DSL.

Working in partnership with parents is important, we will endeavour to do this at all times. It is recognised however that there are occasions when it is in the child or young person's best interest for work to be undertaken and referrals made without the parents' initial consent to ensure the welfare and safety of our students.

We will.

- Aim to help parents understand that we have a responsibility for the welfare of all students and has a duty to refer cases to the Local Authority in the best interests of the student.
- Consider the safety of the student and, should a concern arise the DSL has the responsibility to seek advice prior to contacting parents.
- Make all our policies available on the website and on request.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.

Provide advice and signpost parents and carers to other services where pupils need extra support. We will do this by ensuring our *Supporting Families offer is up to date and available on each school's website*.

Our child protection records will be stored securely and in line with the latest data protection policy.

All safeguarding files will be kept separately from individual student records and stored securely. Information in these files will only be shared with relevant staff when it is necessary consistent with data protection.

We will release information, including police, on receipt of the appropriate documentation in-line with data sharing laws. Upon receipt of any request the DSL/Head teacher will be informed and a decision on an appropriate way forward in line with data protection will be made.

When pupils transfer to another school, college or setting child protection and safeguarding information will be shared with that school, college or setting to ensure safe and consistent support for that child or young person.

We will ensure the new school, college or setting sign a document to say they are in receipt of the safeguarding and child protection file. We will keep his on file until the child or young person's 25TH birth year.

Section 14 Early years Setting within our schools

As an early year's provider delivering the Early Years Foundation Stage (EYFS), our aim is to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance. We will do this by

Ensuring we have a safe secure learning environment where children can be seen and heard at all times.

- A named member of staff in the DSL team.
- A member of staff who always holds a current paediatric first aid qualification and available.
- We will liaise with parents and carers supporting with their Child's development.
- Routine monitoring of health and safety practices to promote Children's safety and welfare.
- Appropriate staff, ratios and qualifications comply with statutory guidance meeting the needs of all children.

We will promote the health of all children and young people including early years by –

- Taking necessary steps to prevent spread of infection.
- Administering medicines and or intimate care is in line with our policies.
- Taking appropriate action where children / young children, including early years are unwell.

Section 15 Our Responsibilities

Safeguarding and promoting the welfare of children is *everyone's responsibility*. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

Knowing what to look for is vital to the early identification of abuse and neglect and if staff are unsure, they should always speak to the DSL or deputy – if in exceptional circumstances, the DSL (or deputy lead) is not available, staff should consider speaking to a member of the ALT or contacting the local Children's Social Care Team. All actions that are completed in the absence of a designated safeguarding person should be shared with them at the very earliest opportunity.

The governing body of New Education Trust will review safeguarding policy and practice in our schools.

All staff working (including visiting staff) must:

- Observe and comply with the staff code of conduct.
- Attend all relevant training and development provided by Bengeworth Multi-Academy Trust
- Induction training must include *safeguarding procedures, whistleblowing, code of conduct, CPOMs training and access to online training modules in safeguarding, fire safety and anaphylaxis.*
- Staff working directly with children will read KCSIE '25 Part 1, Annex 'B'.
- Staff who do not work directly with children will read KCSIE '25 Annex A.
- Know how to deal with a disclosure; if a pupil discloses to a member of staff that they are being abused, the staff member should refer to this policy and procedures in place, *informing the DSL, and recording on the CPOMS system,* following guidance set out in this policy.
- Report instances of actual or suspected child abuse or neglect to the DSL or in their absence, the Deputy DSL. This is in line with the Child Protection Procedures and legal duty for reporting FGM.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to child-on-child abuse. This is most likely to include but not limited to: bullying (including cyber bullying), peer-on-peer abuse and gender-based violence/sexual assaults and sexting. Further information can be found in Annex B of KCSIE '25.
- Know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.
- Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child

who:

- is disabled and has specific additional needs.
 - mental health concerns.
 - has special educational needs (whether or not they have a statutory education, health, and care plan).
 - anti-social or criminal behaviour.
 - is a young carer.
 - is frequently missing/goes missing from care or home.
 - is misusing drugs or alcohol.
 - risk of radicalisation.
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
 - has returned home to their family from care.
- All staff must be aware of the early help process; this includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. All early help cases should be reviewed regularly and if the situation is not improving then consideration should be given to a referral to children's social care for assessment for statutory services.

The DSL and Safeguarding Governor responsibilities

The DSL in liaison with the Safeguarding Governor must:

- Ensure that all staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns and can make appropriate referrals, including to early help services.
- Ensure that there is a culture of listening to children and young people considering their wishes and feelings, making the most of every opportunity to gather their concerns.
- Promote the educational outcomes and track the progress and attainment of all the vulnerable children, but specifically 'those in need of a social worker' or were previously known to social services.
- Deliver a consistent approach to behaviour through the policy principles.
- Ensure that all staff and volunteers are trained sufficiently, so they have the skills, knowledge and understanding necessary to keep children safe at all times, including on site, when attending alternative provision, educational visits off site or work-related learning. We follow the guidance on Keeping Children Safe in Out-Of-School Settings which details the safeguarding arrangements that schools and colleges should expect providers to have in place.
- Ensure that the KCSiE guidelines for effectively managing SEND and safeguarding are in place including the 2025 updates to this area.
- Ensure that there is a deputy DSL in place to add capacity and ensure sustainable provision.
- Ensure consideration to the range of responsibilities the DSL undertakes e.g. the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.
- Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff areas, the staff handbook and website (along with this policy).
- Ensure safe recruitment practice is followed when recruiting to posts, and ensure appropriate action is taken when an allegation is made against a member of staff.
- Ensure each school offers a safe environment through effective implementation of the school health and safety policy to meet the statutory responsibilities for the safety of students and staff at the academy.

The Designated Safeguarding Lead is responsible for:

- Maintaining both a strategic and operational approach to safeguarding.

- Being available term time during academy hours (or the deputy DSL in their absence) for staff or volunteers to discuss any safeguarding concerns.
- Ensuring that all cases of suspected or actual problems associated with child protection are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Headteacher informed and appraised.
- Ensuring the school safeguarding policy and practice is relevant and consistent with the most recent statutory guidance.
- Being aware of the latest national and local guidance and requirements and keeping the Headteacher and staff informed as appropriate.
- Attending accredited, enhanced training as defined by the New Education Trust Safeguarding Arrangements to fulfil the role every two years.
- Ensuring that appropriate training for staff is organised according to the agreed programme with the Headteacher and renewed through ongoing professional development.
- Ensuring families are fully aware of the school safeguarding policies and procedures and kept informed and involved.
- Keeping Children Safe in Education 2025 says that where reasonable possible, schools should hold more than one contact number for every child in the school in case of emergencies, and in case there are welfare concerns at home. The DSL is responsible for ensuring this is in place.
- Ensuring that effective communication and liaison takes place between each school and the Local Authority, and any other relevant agencies, where there is a Safeguarding concern in relation to an academy student.
- Ensuring that all staff understand child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs (SEN) and disabilities and being cognisant of the additional safeguarding concerns that can arise.
- Maintaining details of any looked after child's social worker and the name of the virtual school head (in the authority that looks after the child).
- Working with the Designated Teacher to ensure that the Virtual School Head delivers funding that can be best used to support the progress of looked after children at the academy and meet the needs identified in the child's personal education plan.
- Ensuring that e-safety actions promote safeguarding, including taking the lead responsibility for online safety and understanding the filtering and monitoring systems in place.
- Liaison with the Senior Mental Health Lead, and the local Mental Health Services as appropriate.
- Dealing with allegations of abuse in accordance with local and statutory procedures.
- Having an awareness of the requirements around the role of the Responsible Adult under PACE requirements.

- Supporting the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate if early help is appropriate.
- Ensuring that adequate reporting and recording systems are in place.
- Ensuring relevant records are passed on appropriately when students transfer to other schools or are being educated at alternative provision or off-site education.
- Being aware of children who are or who may be living in a private fostering arrangement informing the local authority where required to support the welfare and safety of the child.
- Providing guidance and advice on the management of peer-on-peer sexual abuse incidents.
- Tracking the progress, attainment and aspirations of children known and previously known to social care.
- Ensuring accurate vulnerability recording within *CPOMS* with the submission of safeguarding data as required.

The Designated and Deputy Safeguarding Lead will meet regularly with the rest of the safeguarding leadership team to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work, including where the DSL has acted as a 'Responsible Adult' under PACE legislation. These meetings must be evidenced by minutes added to *CPOMS*. Other key staff will be invited as appropriate.

Section 16 Statutory Requirements

This policy has been developed in line with the following Statutory key documents:

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Keeping children safe in education 2025'
- DfE (2024) 'Working Together to Improve School Attendance 2024'
- HM Government (2020) 'multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage'

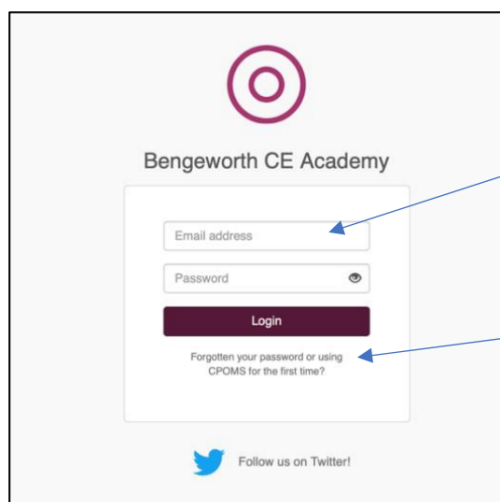
Other non-statutory Guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'

Section 17 Appendices

Appendix A – recording a concern using CPOMS

Using CPOMS



Enter your email address in full in this box. If you know your password and have created an account before, enter it here and click 'login'.

If you have forgotten your password or are using CPOMS for the first time, click here to create or re-set your password. A link will be sent to your email address.

Complete the incident/concern/details as follows:

- **Student:** Type the pupil name; start typing and the system will make suggestions of names on the system and you can choose the correct one.
- **Incident:** Describe the incident you are recording; be accurate and specific; if using a pupil name, make sure this is spelled identically to the Student or Linked Student fields. Please do not use initials for either pupils or adults/staff. Ideally there should also be an 'action' to indicate anything you have done – eg Class teacher to speak to parents.
- **Categories:** Select at least one category; you can select more than one if appropriate. If you are in doubt, choose 'cause for concern'.
- **Linked Students:** Type the name of any pupil that may be linked to this incident; this will ensure the incident is presented when viewing linked student records. Add as many linked students as necessary.
- **Body Map:** If appropriate, expand the Body Map and add markings to the illustration to indicate where physical evidence has been identified. Note the number that appears with each mark on the Body Map and refer to this number when describing the physical evidence. It is sometimes helpful to complete the body map before you describe the incident so that you can refer to the numbers in your explanation. Photographs of injuries must never be taken.
- **Date / Time:** Enter the Date and Time the incident occurred. These will both default to the current Date and Time. Often this means that you will have to change the time to when the pupil disclosed

an incident or when you became aware of a concern, rather than when you are recording it. This is important in order to maintain an accurate chronology of events.

- **Alert Staff Members:** Add to this list any staff members who should be aware of the incident, e.g. the class teacher if they are not in class. Staff will be alerted to the incident via their CPOMS Dashboard (the page they see immediately after login) Staff members who have been selected to receive alerts will also receive an email requesting that they login to CPOMS and review the incident. Click 'Action required' if staff need to add an action to the record.

- **Files:** If you have files to support the incident, these can be uploaded in the box (for example, meeting minutes, children's work or drawings that are of concern). Press the upload button or drag and drop a file into the Files box.

- **Agency Involved:** Optionally, you can add any agencies that may be involved with this particular incident, e.g. the police, social services. Most incidents will not need this further information.

You do not need to assign anything to other members of staff or the safeguarding team as this is done automatically.

When you have finished adding all details to the Incident, press the 'Add Incident' button to submit the content and record it permanently in CPOMS.

If you have not already done so, ensure that you speak to the DSL/one of the deputy as soon as possible so that you can understand and action any response needed, if appropriate. Often this will involve the class teacher talking to parents and recording the response/outcome.

APPENDIX B – Child on child sexual violence and sexual harassment

The following sets out New Education Trust’s response **to all reports and concerns** of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school premises, and or online (what to look out for, and indicators of abuse are set out in Part one of this guidance).

Sexual violence and sexual harassment can occur between two children of **any age and sex**, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of **‘it could happen here’**.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. As set out in Part one of KCSIE 2025, schools and colleges should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships (see also sections on child sexual exploitation and child criminal exploitation at paragraphs 32–39 of KCSIE 2025).

Whilst **any** report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. But it is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should read Part Five of KSCIE 2025 alongside the Departmental advice: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

Part of child-on-child sexual violence and sexual harassment has been expanded to incorporate guidance previously covered in the DfE’s Sexual violence and sexual harassment between children in schools and colleges (2017 and last updated in 2021). It contains further detailed information on:

- what sexual violence and sexual harassment constitutes,

- important context to be aware of, including what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB maybe an indication that they are a victim of abuse themselves,
- related legal responsibilities for schools,
- advice on a whole school approach to preventing child on child sexual violence and sexual harassment, and
- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

Responding to reports of sexual violence and sexual harassment

Part two of KCSIE guidance is clear that systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.

Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports. Governing bodies and proprietors should ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

This guidance does not attempt to provide (nor would it be possible to provide) detailed guidance on what to do in any or every particular case. The guidance provides effective safeguarding practice and principles for schools and colleges to consider in their decision-making process.

Ultimately, any decisions are for the school to make on a case-by-case basis, with the Designated Safeguarding Lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

There is support available for schools and colleges. Paragraph 52 and Annex A in the Sexual Violence and Sexual Harassment Between Children in Schools and Colleges advice provides detailed information and links to resources.

The immediate response to a report

Responding to the report

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and

react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. As per part one of KCSIE 2025, if staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told. The school's or college's initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

As per part one of KCSIE 2025 guidance, all staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a deputy). However, this might not always be possible.
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

The key consideration is for staff not to view or forward illegal images of a child.

The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the Designated Safeguarding Lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to; recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child; recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than

representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;

- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being on-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made**;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the Designated Safeguarding Lead (or deputy), as soon as practically possible, if the Designated Safeguarding Lead (or deputy) is not involved in the initial report.

Risk assessment

When there has been a report of sexual violence, the Designated Safeguarding Lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support.
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

The Designated Safeguarding Lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or

sexual violence specialists will be required. The above school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's approach to supporting and protecting their pupils and students and updating their own risk assessment.

Action following a report of sexual violence and/or sexual harassment

What to consider

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of '**it could happen here**'. Schools and colleges should be aware of and respond appropriately to **all** reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The Designated Safeguarding Lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's or college's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed.
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, or adult students; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools should follow general safeguarding principles as set out throughout KCSIE guidance. **Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The starting point regarding any report should always be that there is a zero tolerance

approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “**banter**”, “**just having a laugh**”, “**part of growing up**” or “**boys being boys**” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Children sharing a classroom: Initial considerations when the report is made

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing. Whilst the school or college establishes the facts of the case and starts the process of liaising with children’s social care and the police, the alleged perpetrator(s) **should** be removed from any classes they share with the victim. The school should also **carefully** consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately.

In all cases, the initial report should be carefully evaluated, reflecting the considerations set out at paragraph 448. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

Options to manage the report

It is important that schools consider every report on a case-by-case basis as per paragraph 483 of KCSIE 2025. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children’s social care and/or the police, then, as a general rule, the school should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school taking immediate action to safeguard their children, where required.

There are four likely scenarios for schools to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of

concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

1. Manage internally

- In some cases of **sexual harassment**, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

2. Early help

- In line with 1 above, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the Designated Safeguarding Lead (and their deputy) know what the Early Help process is and how and where to access support. More information on Early Help is set out in part one of KCSIE 2025 with full details of the early help process in Chapter one of Working Together to Safeguard Children.
- Multi-agency early help will work best when placed alongside strong school policies, preventative education and engagement with parents and carers.
- Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).
- Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

3. Referrals to children's social care

- Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local children's social care.

- At the point of referral to children’s social care, schools will generally inform parents or carers, unless there are compelling reasons not to (if informing parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children’s social care.
- If a referral is made, children’s social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the school or college (especially the Designated Safeguarding Lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- Schools should not wait for the outcome (or even the start) of a children’s social care investigation before protecting the victim and other children in the school or college. It will be important for the Designated Safeguarding Lead (or a deputy) to work closely with children’s social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 480–482 of KCSIE 2025 will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school should be **immediate**.
- In some cases, children’s social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the Designated Safeguarding Lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the Designated Safeguarding Lead (or a deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it should be under-pinned by the principle that there is a **zero tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- **All concerns**, discussions, decisions and reasons for decisions should be recorded (written or electronic).

4. Reporting to the Police

- **Any report** to the police will generally be in parallel with a referral to children’s social care (as above).
- It is important that the Designated Safeguarding Lead (and their deputy) are clear about the local process for referrals and follow that process.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and

colleges decide when to engage the Police and what to expect of them when they do: When to call the police.

- Where a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- At this stage, schools will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.
- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the Designated Safeguarding Lead (and their deputy) are aware of their local arrangements.
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the Designated Safeguarding Lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school take do not jeopardise the police investigation.
- If schools have questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions).
- Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Considering bail conditions

- The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.
- Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.
- Whatever arrangements are in place; the school will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.

- Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc).
- Careful liaison with the police investigators should help to develop a balanced set of arrangements.

Managing any delays in the criminal process

There may be delays in any case that is being progressed through the criminal justice system. Schools **should not wait** for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school. The risk assessment as per paragraph 487-489 Of KCSIE 2025 will help inform any decision.

The end of the criminal process

- If a child is convicted or receives a caution for a sexual offence, the school should update its risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same school as the victim, the school should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school or college thinks are reasonable and proportionate with regard to the perpetrator(s) timetable.
- Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school. It will be important that the school ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).
- Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school or college should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

Unsubstantiated, unfounded, false or malicious reports

As set out in paragraph 68 of Part one of KCSIE 2025, **all** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care maybe appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Ongoing response

Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools should beware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre
- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- Childline / IWF: Remove a nude image shared online *Report Remove* is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, schools should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or Designated Safeguarding Lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). Schools should respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While schools should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools should provide a physical space for victims to withdraw.

It may be necessary for schools to maintain arrangements to protect and support the victim for a long time. Schools should be prepared for this and should work with children's social care and other agencies as required.

It is therefore important that the Designated Safeguarding Lead knows how and where to seek support.

It is important that the school do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain in their school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The Designated Safeguarding Lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Ongoing Considerations: Victim and alleged perpetrator(s) sharing classes

Once the Designated Safeguarding Lead (or a deputy) has decided what the next steps will be in terms of progressing the report, they should carefully consider again the question of the victim and alleged perpetrator(s) sharing classes and sharing space at school. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them.

It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the

best interests of the child should come first. In all cases, schools should follow general safeguarding principles as per this guidance.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school should also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during before and after school-based activities) and on transport to and from school where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). As per paragraph 463 of KCSIE 2025, close liaison with the police is essential.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school or college should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator(s) is going to remain at the school, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

In all cases, schools should record and be able to justify their decision-making. Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. In all cases, schools should record and be able to justify their decision-making.

All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice: Sexual violence and sexual harassment between children at schools and colleges. The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- The school will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The Designated Safeguarding Lead should take responsibility to ensure this happens as well as transferring the child protection file. Information sharing advice referenced at paragraphs 115–123 will help support this process.
- Stop it now – professionals looking for advice provides support for professionals in child sexual abuse prevention, so that they're well equipped to keep children safe.

Appendix C – Key safeguarding personnel

Bengeworth Academy

The Designated Safeguarding Lead (DSL) is: Mrs Natalie Snowdon (Deputy Headteacher)
Contact details: email: nem10@bengeworth.worcs.sch.uk Telephone: 01386 442047

The Early Years Designated Safeguarding Lead (DSL) is: Mrs Sian Harley-Preller (Deputy Headteacher)
Contact details: email: so22@bengeworth.worcs.sch.uk Telephone: 01386 442047

The deputy DSLs are: Mrs Hayley Potter (Headteacher) Contact details: email: head@bengeworth.worcs.sch.uk Telephone: 01386 442047

Mrs Katy Roleston (Assistant Headteacher) Contact details: email: km51@bengeworth.worcs.sch.uk Telephone: 01386 442047

Mr Thomas Edkins (Assistant Headteacher) Contact details: email: tge3@bengeworth.worcs.sch.uk Telephone: 01386 442047

Mrs Jane Wadmore (Family Support Professional) Contact details: email: jwadmore@bengeworth.worcs.sch.uk Telephone: 01386 442047

The nominated safeguarding and child protection governor is: Mr James Poolton Contact details: email: jpoolton@bengeworth.worcs.sch.uk Telephone: 01386 442047

Other named staff and contacts:

- **Designated Teacher for Children in Care** – Mrs Katy Roleston
- **Nominated Governor for Children in Care** – Mrs Christine Spriggs • **Nominated Anti Bullying Governor** – Mrs Christine Spriggs
- **Online Safety Co-ordinators** – Mrs Natalie Snowdon and Mr Ben Hunt
- **Safeguarding in Education Adviser, WCF** – Mrs Denise Hannibal
- **Chanel Chair** – Paul Kinsella, Advanced Public Health Practitioner
- **Local Authority Designated Officer/Position of Trust** – Mr Jon Hancock – 01905 846221
- **Safeguarding Training Provider** – Mrs Hayley Potter (in school), Hays Education (e-learning)
- **Family Front Door (Children’s Social Care)**: 01905 822666 (core working hours), Out of hours or at weekends: 01905 768020

Bretforton Village School

Role	Name	Email address	Contact Number
Designated Safeguarding Lead (DSL)	Kevin Riley	kriley@bretforton.worcs.sch.uk	01386 830418
Deputy DSL	Rachael Howard	Reh64@bretforton.worcs.sch.uk	01386 830418
Nominated Safeguarding Governor	Charlotte Wight	cwight@bretforton.wworcs.sch.uk	01386 830418
Headteacher	Kevin Riley	kriley@bretforton.worcs.sch.uk	Kevin Riley
Chair of Governors	Tony Love	tlove@bretforton.worcs.ch.uk	01386 830418

Other named staff and contacts:

- Designated Teacher for Children in Care- Kevin Riley
- Online Safety Co-ordinator – Kevin Riley
- Safeguarding in Education Adviser, WCC Denise Hannibal
- Family Front Door: 01905 822666 (core working hours)
- Out of hours or at weekends: 01905 768020
- Prevent Lead: Paul Kinsella WCC
- Safeguarding in Education Adviser, WCF – Mrs Denise Hannibal
- Chanel Chair – Paul Kinsella, Advanced Public Health Practitioner
- Local Authority Designated Officer/Position of Trust – Mr Jon Hancock – 01905 846221
- Family Front Door (Children’s Social Care): 01905 822666 (core working hours), Out of hours or at weekends: 01905 768020

Church Lench CE First School

Safeguarding Governor: Mrs Emma Buckingham and Dr Saskia Bakker

Designated Safeguarding Lead: Mrs Samantha Price

Deputy Designated Safeguarding Leads: Mrs Hayley Pratley and Ms E Munro

Prevent Lead: Mrs Samantha Price Safeguarding in Education Adviser, WCF – Mrs Denise Hannibal

Chanel Chair -Paul Kinsella, Advanced Public Health Practitioner

Local Authority Designated Officer/Position of Trust – Mr Jon Hancock - 01905 846221

Family Front Door (Children's Social Care): 01905 822666 (core working hours), Out of hours or at weekends: 01905 768020

Bengeworth Multi Academy Trust

Brilliant People • Better Schools • Bright Futures

Bengeworth Multi Academy Trust
King's Road, Evesham, WR11 3EU
office@bengeworth.worcs.sch.uk

www.bengeworthtrust.co.uk

Company Registration Number: 08943457

UID: 16942

UKPRN: 10060770

