St Benedict
CATHOLIC ACADEMY TRUST

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St Benedict Catholic Academy Trust (going forward SBCAT) is committed to providing a safe and secure environment for children, staff and visitors and promoting a culture of openness, trust and transparency where children and staff will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of children by protecting them from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The School's Safeguarding policy draws upon duties conferred by the Children Acts 1989 and 2004, The Education & Inspections Act 2006, The Serious Crimes Act (2015), The Children and Families Act 2014, The Children and Social Work Act 2017, S175 of the 2002 Education Act (as amended), The Education (Independent School Standards) Regulations 2014 (for independent schools), The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools), the Apprenticeships, Skills, Children and Learning Act 2009 (as amended), the Education and Training (Welfare of Children) Act 2021, The Mental Capacity Act 2005, The Care Act 2014, and the guidance contained in "*Working Together to Safeguard Children*", the DfE's statutory guidance "*Keeping children safe in education*", Ofsted Guidance and procedures produced by the London Safeguarding Children Partnership (*LSCP*).We also have regard to the advice contained in DfE's "*What to do if you're worried a child is being abused*" and "*Information Sharing – Advice for practitioners*". The policy is applicable to all on site, off-site and online activities undertaken by pupils whilst they are the responsibility of the school, including pupils who might be placed in Alternative Provision.

We will ensure that all staff regardless of whether they work indirectly or directly with children read Part One of Keeping Children Safe in Education in full. We will also ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of the guidance.

1. POLICY AIMS

The purpose of this policy is to:

- Outline the role of the Trust Board
- Identify the names of responsible persons in SBCAT schools and explain the purpose of their role
- Describe what should be done if anyone in an SBCAT school has a concern about the safety and welfare of a child who attends the school
- Identify the particular attention that should be paid to those children who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of training
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children are safeguarded when there is potential to come into contact with non-school staff, e.g. volunteers, contractors etc.
- Outline how allegations against/concerns raised in relation to staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life of the school
- Describe how the school's filtering and monitoring systems and curriculum will respond to emerging online safety issues, such as generative artificial intelligence (AI) including use of deep fakes, disinformation, misinformation and conspiracy theories
- Outline how the implementation of this policy will be monitored.

This policy is consistent with all other policies adopted by the Trust Board or local governing body and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children:

1) ***Attendance***
2) ***Behaviour***
3) ***Staff Code of Conduct***
4) ***Complaints***
5) ***Health & Safety***
6) ***On-line safety & Acceptable use***
7) ***AI (Artificial Intelligence)***
8) ***Mobile phone use (including guidelines for staff use)***
9) ***Equality, Diversity and Inclusion***
10) ***Curriculum***
11) ***Relationships, Sex & Health Education***
12) ***Restrictive Interventions, Restraint and Seclusion***
13) ***First Aid***
14) ***Privacy Notice***
15) ***Whistleblowing***

2. SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

Safeguarding and promoting the welfare of children is defined in *Working Together to Safeguard Children* guidance as:

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

- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the *Children's Social Care National Framework*.

3. THE ROLE OF THE TRUST BOARD

The Trust Board will ensure that all Directors and local board Governors will comply with their duties under legislation and that the policies, procedures and training in the schools are effective and comply with the law at all times. The Trust Board will also ensure that all Directors and local Governors receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in SBCAT schools are effective and support the delivery of a robust Trust wide approach to safeguarding. Their training will be regularly updated. The Trust Board is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements. Further information can be found at *Human Rights | Equality* and *Human Rights Commission* and *Equality Act 2010: advice for schools*.

The Trust Board is also aware of duties placed by the Data Protection Act 2018, Data (Use and Access) Act 2025 and the UK General Data Protection Regulation (UK GDPR) on organisations and individuals to process personal information fairly and lawfully and to keep the information we hold safe and secure. We note the ICO guidance '*For Organisations*' which includes information about our obligations and how to comply, including protecting personal information, and providing access to official information. **The Trust Board is aware that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children**.

The Trust Board also notes the *DfE Data Protection guidance for schools*, which will help SBCAT and school staff and governors understand how to comply with data protection law, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

The Trust Board recognise that whilst all children should be protected, some groups of children, such as children who need a social worker (Child in Need and Child Protection Plans); children who are absent from education; children requiring mental health support; looked after and previously looked after children; care leavers; children with special educational needs, disabilities or health issues, are potentially at greater risk of harm than others (both online and offline).

The Trust Board will do all that they reasonably can to limit children's exposure to the risks from school IT systems, including AI. As part of this process, the Trust Board will ensure that schools have appropriate filters and monitoring systems in place and review and log their effectiveness on a yearly basis in line with updated statutory guidance. They will ensure that leadership teams 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. The Trust Board will consider the age range of our children, the number of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

In accordance with the DfE's *filtering and monitoring standards*, the Trust Board have assigned a senior leader, SBCAT Director of Education and Safeguarding Lead Felicity Corcoran and Eugene Clarke SBCAT Digital Lead to ensure that these standards are being met. They will work with the SBCAT CEO Jonathan Ronan to identify and assign roles and responsibilities to manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs. We note the DfE's '*plan technology for your school service*' to self- assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them and the *Generative AI: product safety*

expectations guidance to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

The Trust Board will ensure SBCAT schools contribute to inter-agency working in accordance with statutory guidance "*Working Together to Safeguard Children*" and that SBCAT school's safeguarding arrangements take into account the procedures and practice of the local authorities as part of the inter-agency safeguarding procedures and London Children's Safeguarding Board protocols.

The Trust Board has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by SBCAT Director of Education and Safeguarding Lead or the CEO.

The Trust Board has nominated Noel Campbell, as Chair of the Trust to be the nominated Link Director for Safeguarding.

Concerns about and allegations of abuse made against SBCAT Headteachers will be referred to the CEO who will liaise with the relevant LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against a Headteacher.

SBCAT headteachers will provide termly reports to their local Governing Board and Trust board outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

Also, as a good practice, the nominated local board safeguarding Governor will meet on a regular basis with their school's DSL to monitor the school's safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the school is meeting its duties in respect of safeguarding.

4. SBCAT STAFF RESPONSIBILITIES AND IMMEDIATE ACTION

Safeguarding and promoting the welfare of children in our Trust is the responsibility of the whole Trust community. All adults working in this Trust (including visiting staff, trainee teachers, supply teachers, and volunteers) are required to report instances of actual or suspected child abuse, neglect or exploitation to the Designated Safeguarding Lead (DSL) or to a Deputy Designated Safeguarding Lead (DDSL) in their respective schools.

The Designated Safeguarding Lead who in each SBCAT school is a senior member of the school's leadership team takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and works with the mental health leads where safeguarding concerns are linked to mental health, provides advice and support to other staff on child welfare and child protection matters, takes part in strategy discussions and inter-agency meetings, and/or supports other staff to do so, and contributes to the assessment of children in need, at risk of significant harm and those who may benefit from Early Help assessments. The DSL in each SBCAT school has a significant level of responsibility and SBCAT Leaders will ensure SBCAT Headteachers provide the DSL via their school additional time, funding, training, resources, and support needed to carry out the role effectively. Whilst the activities of the DSL in each school can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility should not be delegated. During term time the DSL (or a deputy) in each SBCAT school will always be available (during school hours) for staff in their school to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances.

CPOMS must be set up in each SBCAT school to ensure that safeguarding concerns can be submitted, received, monitored, and acted upon without delay by the DSL and deputies. However, if a pupil is at risk of immediate harm, the member of staff must take all actions necessary to locate the DSL/Deputy or Headteacher in person or sending another member of staff to do so(without sharing any details other than it is an urgent safeguarding concern which requires immediate action) in order to remain with the pupil in need. The DSL in each SBCAT school is responsible for ensuring that filtering and monitoring systems and processes for their School's IT systems are in place and

updated in accordance with the latest DfE guidance. Support will be provided as needed from SBCAT Leaders.

The DSL in each SBCAT school is the first point of contact for external agencies that are pursuing Child Protection investigations and co-ordinates the school's representation at CP conferences and Core Group meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the DSL, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue. Where there is any doubt as to the seriousness of this concern, or disagreement between the DSL and the member of staff reporting the concern, advice will be sought from the SBCAT Director of Education and Safeguarding Lead Felicity Corcoran. If a child is in immediate danger or is at risk of harm, a referral will be made to the relevant LA Multi Agency Safeguarding Hub (MASH) and/or the police immediately (see *when to call the police: guidance for schools and colleges*).

The DSL in each SBCAT school will exercise their duty to challenge the actions or decisions of Children's Social Care or any other partner agency, via LA *local escalation procedures*, where it is believed that an individual professional or agency might not be acting in the best interest of the child concerned.

All our staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to another member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

The DSL in each SBCAT school is also aware of the requirement for children to have an Appropriate Adult. Further information can be found in the *Statutory guidance - Police and Criminal Evidence Act (PACE) Code C 2019*.

5. TYPES of ABUSE AND NEGLECT

5.1 Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

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

5.3 Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they

are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person, it may take the form of verbal abuse e.g., persistent criticism, belittling, or name-calling. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

5.4 Sexual abuse: involves forcing, causing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Children under 13 can never legally consent to sexual activity. Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children. Evidence consistently shows that children are more likely to know their abuser than not.

5.5 Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSLs will be considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as *Contextual Safeguarding*, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

In addition to these types of abuse and neglect, members of staff will also be alert to following specific safeguarding issues:

5.6 Mental Health

We 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on *Mental Health and Behaviour in Schools*.

5.7 Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who are regularly absent from school or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

5.8 Child Sexual Exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; being regularly absent from school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: *Child sexual exploitation: guide for practitioners*.

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this school, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 15, an individual risk assessment will be conducted in accordance with the *London Safeguarding Children Procedures*. This will determine how and when information will be shared with parents and the investigating agencies.

5.9 Serious violence

All staff will be made aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We are aware that there are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is

a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents *Advice to schools and colleges on gangs and youth violence* and *Criminal exploitation of children and vulnerable adults: county lines*.

5.10 County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing from school or home and are subsequently found in areas away from their home; have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing.

5.11 Child on child abuse Including harassment and violence

Children are capable of abusing other children. This can happen both inside and outside of school and online and take different forms, such as bullying (including cyberbullying, prejudice-based, faith targeted abuse and discriminatory bullying including racism and faith based predjudice, misogyny, toxic masculinity and harmful gender sterotypes) - which must be recognised as harm in their own right as they can have a significant impact on a child's welfare and sense of safety; abuse in intimate personal relationships between children; physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse; violence, particularly pre-planned, forcing other children to use drugs or alcohol, initiation/hazing type violence and rituals), emotional abuse , and financial exploitation (including financially motivated sexual extortion / "sexploitation", blackmail, threats and intimidation), sexual violence, such as rape, assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes or AI/deepfake images and/or videos, sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children performing indecent acts) and upskirting, which typically involves 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. Upskirting is now a criminal offence. Although it is more likely that girls will be victims and boys' perpetrators, all child-on-child abuse is unacceptable and will be taken seriously. We do not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up".

SBCAT schools have a strong commitment to an anti-bullying policy and will consider all coercive acts and child on child abuse within a Child Protection context. We recognise that some pupils will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school's behaviour policy. As a Trust, we will minimise the risk of allegations against other pupils by promoting an inclusive and anti discriminatory culture and providing a developmentally appropriate PSHE curriculum in our schools which develops pupils' understanding of acceptable behaviour, and keeping themselves safe, having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils. It is important that all SBCAT staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. Any possible child-on-child abuse cases must be shared with the DSL in the relevant school with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on *Preventing and Tackling Bullying*.

5.12 Sexual harassment, online sexual abuse and sexual violence

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable in SBCAT schools and each school has appropriate sanctions in place. We understand that sexual harassment, online sexual abuse and sexual violence may be happening in and around our schools, even when there are no specific reports.Our school staff (supported by SBCAT) work actively to prevent sexual harassment, online sexual abuse and sexual violence through whole-school approaches that include an effective behaviour policy, pastoral support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, AI deepfakes/manipulation, AI chatbots, misogyny, sexual violence, sexual violence against women and girls and issues of consent. We will ensure that children are taught about safeguarding risks, including online risks and will support pupils to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware and have appropriate knowledge of '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "*Keeping children safe in education*". All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, students with SEN and LGBTQ+ children). We will identify and address any barriers that can prevent a pupil from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL in their school with a view to ensuring that support systems are in place for victims. Where necessary, schools will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police. SBCAT schools will keep comprehensive records of all allegations.

5.13 Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). 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. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will affect their educational attainment. SBCAT schools will handle reports of sexual violence and harassment between children, both on and outside school premises, in accordance with '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "*Keeping children safe in education*" and train our staff accordingly (including teachers delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with their school's DSL with a view to ensuring that support systems are in

place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to MASH and reporting to the Police.

On one hand, we need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

5.13 Harmful sexual behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. We consider HSB in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. We aim to have a good understanding of HSB, which will aid in planning preventative education, implementing preventative measures and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We will work with appropriate agencies to address HSB and to support children displaying HSB.

6. MAKING OF OR SHARING NUDES or SEMI NUDES

This section is informed by DfE recommended guidance from the UK Council for Internet Safety and Department for Science, Innovation and Technology for all staff and for DSLs and senior leaders.

6.1 Staff responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If any member of staff is made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI including image manipulation,deep fakes, AI chat bots etc they must report it to their schools DSL immediately.

They must **not**:

- View, copy, print, share, store or save the imagery, or ask a pupil to share or download it (if a staff member has already viewed the imagery by accident, they must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

- Say or do anything to blame or shame any young people involved

Staff should explain that they need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

6.2 Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

6.3 Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

6.4 Informing parents/carers, the police and recording incidents

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

If it is necessary to refer an incident to the police, this will be done through local a police community support officer if schools have one, if not referrals should be referred to local neighbourhood police or if no response is received referrals should be made by dialling 101.

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI/deepfakes and the decisions made in responding to them, must be recorded on CPOMS.

6.5 Curriculum coverage

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part at the relevant and age appropriate stage of their education and in line with the statutory DfE and CES relationships education / relationships and sex education policies and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes at the relevant stage of pupil's education:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI including image manipulation,deep fakes and risks of AI chatbots
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

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

SBCAT and School policies and procedures about making or sharing of nudes and semi-nudes are also shared with pupils (at the appropriate point in their RSE/Online Safety curriculum) so they are aware of the processes their school will follow in the event of an incident.

7. CHILDREN WHO ARE LESBIAN, GAY or BISEXUAL

We note that a child or a young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Risks can be compounded where children lack a trusted adults with whom they can be open. Our staff will endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. Lesbian, gay, or bisexual inclusion is part of the statutory *Relationships Education, Relationship and Sex Education and Health Education* curriculum. We will work with appropriate agencies to counter homophobic, and biphobic bullying and abuse and to provide support to lesbian, gay, or bisexual children.

8. PUPILS WHO ARE QUESTIONING THEIR GENDER

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

We will take a strong, proactive stance on all forms of bullying based on gender. SBCAT Schools provide more detail in their behaviour policies.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach, a school'c DSL will lead in these cases.

Where a child who is questioning their gender asks for support from their school, DSLs will engage parents/carers as a matter of priority.

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

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

8.1 Considering requests for support with social transition

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

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

In making decisions about supporting social transition, our schools will ensure compliance with their obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. SBCAT schools will make decisions in line with the following principles:

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

9. SINGLE SEX SPACES

In SBCAT schools the following will be in place to ensure compliance with statutory legislation:

Schools will provide separate single-sex toilet facilities for boys and girls aged 8 and over.

Schools must provide separate single-sex changing rooms and washing facilities and children should not wash or change in front of peers of the opposite biological sex with no exceptions.

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

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

10. DOMESTIC ABUSE

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. 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 and/or violence 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. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with their school's DSL with a view to referring to appropriate agencies

10.1 Operation Encompass

At SBCAT we are working in partnership with the Metropolitan Police and Children's Services to identify and provide appropriate emotional and practical help and support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass.

The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in or witness to a domestic abuse incident. Domestic abuse impacts on children in a number of ways. Children are at increased risk of physical injury during an incident, either by accident or because they attempt to intervene. Even when not directly injured, children are greatly distressed by witnessing the physical and emotional suffering of a parent.

Encompass has been created to highlight this situation. It is the implementation of key partnership working between the police and schools. The aim of sharing information with local schools is to allow 'Key Adults' the opportunity of engaging with the child and to provide access to support that allows them to remain in a safe but secure familiar environment. Further information is available via *Operation Encompass*.

In order to achieve this, the police will share information of all domestic incidents where one of our pupils has been present, with the relevant DSL. On receipt of any information, the DSL will decide on the appropriate support the child requires, this should be covert dependent on the needs and wishes of the child. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The purpose and procedures in *Operation Encompass* have been shared with all parents and governors, is detailed as part of the school's Safeguarding Policy and published on our school website.

10.2 Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender–based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

10.3 So-called 'honour-based' abuse (HBA) (including Female Genital Mutilation and Forced Marriage)

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child that might be at risk of HBA or who has suffered from HBA, they will share it immediately with their school's DSL with a view to referring to appropriate agencies.

10.4 Female Genital Mutilation (FGM)

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM.

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be

examining pupils or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "*Mandatory Reporting of Female Genital Mutilation – procedural information*". A useful summary of the FGM mandatory reporting duty is available in *FGM Fact Sheet*.

Staff in SBCAT schools will be made aware that they must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless they have good reason not to, they will still discuss any such case with the DSL(or deputy) with a view to involving children's social care as appropriate. The DSL (or deputy) will support the member of staff to make the referral.

10.5 Forced marriage

Forcing a person into a marriage is a crime in England and Wales and the law forbids formal or informal marriages involving anyone under the age of 18. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's statutory guidance *The right to choose: government guidance on forced marriage* and especially Chapter 8 of the *Multi-agency guidelines*, which is specifically aimed at teachers, lecturers and other members of staff within schools, colleges and universities.

We note that, 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.

Any possible forced marriage case will be shared with the school's DSL with a view to referring to appropriate agencies following the referral procedures.

11. PREVENTING RADICALISATION

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Our schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.
- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or

ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.

- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. We see the Prevent duty as part of our school's wider safeguarding obligations and note the revised *Prevent duty guidance: for England and Wales*, especially paragraphs 141-210.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

We will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to the relevant LA Multi Agency Safeguarding Hub (MASH). MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed though the MASH multi agency information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns. The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

12. PRIVATE FOSTERING

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

The law requires that the relevant local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the LA's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If staff in SBCAT schools become aware of a child in a private fostering arrangement within any LA, the DSL (or deputy) school will notify the relevant LA's Multi Agency Safeguarding Hub (MASH). Advice about whether there is a need to notify the council can also be obtained by contacting the relevant LA MASH team.

13. ALTERNATIVE PROVISION

If an SBCAT school needs to place a pupil off-site with an alternative provision provider, the SBCAT school will continue to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. The SBCAT school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that we would otherwise perform on our own staff).

The SBCAT school will ensure that we always know where a child is based during school hours and will have systems in place to constantly monitor the child's daily attendance at the placement. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The SBCAT schools will regularly review the alternative provision placements they make. The Trust notes the DfE's two pieces of statutory guidance to which commissioners of Alternative Provision should have regard: *Alternative Provision* and *Education for children with health needs who cannot attend school*.

14. SAFEGUARDING REFERRALS

Where there is a safeguarding concern, staff in SBCAT schools will take into account the child's wishes and feelings when determining what action to take and what services to provide. SBCAT schools will have systems in place for children to express their views and give feedback. SBCAT schools will acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, schoolwork or other children. Ultimately, all SBCAT schools' systems and processes operate with the best interests of the child at heart.

Referrals to services regarding concerns about a child or family typically fall into three categories:

- Family Help Services (formally Early Help);
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

We note that the majority of Multi Agency Safeguarding Hubs (MASH) adopted the London Safeguarding Children Partnership (LSCP) *Threshold Document*, which provides a framework for professionals who are working with children, young people and families and aims to help identify when a child may need safeguarding or need additional support to achieve their full potential. It introduces a continuum of help and support, provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person needs additional support.

The Department for Education (DfE) has set a clear deadline requiring safeguarding partners to ensure that Multi-Agency Child Protection Teams (MACPTs) are fully operational by **March 2027**. This rollout forms part of a wider social care overhaul driven by the Children's Wellbeing and Schools Act 2026.

We also note the LSCP's *The Continuum of Need Matrix*, which is not an exhaustive list but provides examples that can be used as a tool to assist assessment, planning and decision making for professionals working to safeguard and promote the welfare of children. Safeguarding indicators will always be considered alongside a child's other needs. We will refer to LSCP's Threshold Document and Continuum of Need Matrix when assessing the children's needs and making referrals to MASH.

When there is a clear concern that a child may need protection, according to the *The Continuum of Need Matrix*, the safeguarding referrals will be made to the relevant LA Multi Agency Safeguarding Hub (MASH) by submitting an online referral form.

When school staff are undecided about whether the circumstances require a referral or require general advice and guidance about a situation, there will be a verbal consultation by the DSL/Deputy with the relevant LA MASH social worker or manager, by calling the duty desk on the relevant number**,** to seek further guidance (see front of policy for LA contact details). The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Abuse, fabricated or induced illness or the SBCAT school DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent will be provided with the referral.
Within one working day of a referral being received, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. The school must follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, the school should consider following the relevant LA ***local escalation procedures*** to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

14.1 Family Help (formally Early Help)

Family help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Family help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention. SBCAT staff will be alert to the potential need for early help for a child who is disabled or has certain health conditions and has specific additional needs; has special educational needs (whether or not they have a statutory education; health and care (EHC) plan); is a young carer; is bereaved; is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime; is frequently missing/goes missing from care or from home; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of being radicalised; is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online; is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; is misusing drugs or alcohol themselves; is suffering from mental ill health; has returned home to their family from care; is a privately fostered child; has a parent or carer in custody or is affected by parental offending; is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage; is missing education, or persistently absent from school, or not in receipt of fulltime education, or has been placed on a part time timetable; has been repeatedly removed from class, experienced multiple internal and/or external suspensions and is at risk of, or has been permanently excluded.

The relevant LA family help referral form should be used to request additional family help for a family when the needs of a child are beyond the level of support that can be provided by universal services. Use the LA Family Help Service duty number, which usually gives four options:

- General enquiries and signposting
- Family Help Duty Manager for general advice including consultations around potential and new referrals and current casework
- Education, Inclusion and Attendance support and advice including all enforcement activity
- Parenting support and advice and information on parenting course and group work programmes

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. **If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested**.

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

All parents applying for places at schools in SBCAT schools will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the school, parents will be notified of this as soon as possible.

SBCAT schools recognise the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or pupils travelling to and from school and will take all reasonable steps to lessen such risks.

15. VULNERABLE PUPILS

Particular vigilance will be exercised in respect of pupils who are subject to Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker and confirmed in writing. If the pupil in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for children in public care. The School's Designated Teacher for Looked-after and Previously Looked-after Children will work with the virtual school head, who manages pupil premium plus for looked after children, to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher will also work with the virtual school head to promote the educational achievement of previously looked after children. We note the DfE's statutory guidance *Designated teacher for looked-after and previously looked-after children*. Where a child has an allocated social worker, the SBCAT school staff liaise with the relevant LA's virtual school head who, in addition to their statutory duties, now has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We also note that the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. The DfE's non-statutory guidance on *Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension* contains further information on the roles and responsibilities of virtual school heads.

Local authorities should share with SBCAT schools the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children. Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or being absent from education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges. Further information can be found in the DfE's *SEND Code of Practice 0 to 25* and *Supporting Pupils at School with Medical Conditions*.

If a pupil discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the DSL in the SBCAT school as a safeguarding issue.

SBCAT schools also acknowledge the additional need for support and protection of children who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions, pupils who are excluded from school and pupils where English is an additional language, particularly for very young children, using the translation service if necessary.

16. TRAINING

All staff in SBCAT schools and the central team will receive appropriate safeguarding and child protection training (including online safety, which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and risks of AI) at induction, which is regularly updated. In addition, all staff in SBCAT schools and central team will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge

to safeguard children effectively. All newly recruited staff (teaching and non-teaching) local governors and Trust directors will be apprised of this policy and will be required to attend relevant training. In addition, all new staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy either before or on the 1st day they start their employment.

Arrangements are in place for all non-classroom based support staff: including meals, cleaning and other contracted staff to receive relevant induction and ongoing safeguarding training.

The Designated Safeguarding Lead in SBCAT schools (and their Deputies) will attend an appropriate induction course and then refresher training at least every two years. The designated safeguarding lead will also undertake Prevent awareness training and will be able to understand the unique risks associated with online safety. In addition to this formal training, their knowledge and skills will be refreshed (for example, via e-bulletins, meeting other designated safeguarding leads or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. Designated Safeguarding Leads staff will be expected to attend appropriate Trust network meetings and to participate in any multi-agency training programme organised by the relevant LA Safeguarding team.

17. RECRUITMENT

SBCAT is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse children. Safe recruitment processes are followed and all staff recruited to SBCAT schools and the central team will be subject to appropriate identity, qualification and health checks. As part of the shortlisting process, we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken. The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in the SBCAT school or central team, as outlined in Part three of the DfE guidance "*Keeping children safe in education*". We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare "*Disqualification under the Childcare Act 2006*", which also contains information about 'disqualification by association'.

Relevant members of staff, directors and local governors who are involved in recruitment will undertake safer recruitment training. SBCAT schools will ensure that at least one person on any appointment panel has undertaken safer recruitment training in accordance with staffing regulations.

SBCAT Schools will only use employment agencies which can demonstrate that they positively vet their supply staff. Any alleged misconduct of temporary or agency staff will be reported to the employer concerned and to the relevant LA's Designated Officer (LADO). Staff joining SBCAT schools on a permanent or temporary basis will be given a copy of this policy.

No new employee may commence at an SBCAT school prior to the physical receipt of a satisfactory DBS certificate.

Staff should be directed to their school's relevant staff handbook or staff portal and the SBCAT website where the school's safeguarding procedures and the allegations against staff procedures are published.

18. VOLUNTEERS

Any parent or other person/organisation engaged by an SBCAT school to work in a voluntary capacity with pupils will be subject to all reasonable vetting procedures and Criminal Records (DBS) Checks.

Under no circumstances a volunteer in respect of whom no checks have been obtained will be left unsupervised or allowed to work in regulated activity.

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school are deemed to be in regulated activity. SBCAT schools will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, SBCAT schools may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

Under KCSIE 2026, the supervision exemption for volunteers carrying out teaching, training, or care has been removed. Volunteers undertaking these roles and volunteers working in EYFS in any capacity are now classified as being in regulated activity, even if supervised and therefore they require an Enhanced DBS check with Children's Barred List information. **Volunteers must not begin working in SBCAT schools until the school has received their enhanced DBS certificate, including barred list information.**

Further information on checks on volunteers can be found in Part three of the DfE guidance "*Keeping children safe in education*".

Volunteers will be subject to the same code of conduct as paid employees of the SBCAT school.

Voluntary and third sector groups that operate within SBCAT schools or provide off-site services for SBCAT pupils or use SBCAT school facilities will be expected to adhere to this policy or operate a policy which is compliant with the procedures adopted by the local authorities. Premises lettings and loans are subject to acceptance of this requirement.

If it comes to our attention that an allegation or complaint of mistreatment has been made against an employee or volunteer of such an organisation, this will be reported by the SBCAT School to the Local Authority's Designated Officer (LADO).

Where services or activities are provided separately by another body, SBCAT schools will seek written assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with their school on these matters where appropriate. SBCAT schools will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. SBCAT yearly safeguarding audits will review these agreements and the provider's policies as part of their due diligence work.

We note the DfE's *non-statutory guidance for providers running out-of-school settings*.

19. STAFF CODE OF CONDUCT

All SBCAT staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. The Teachers' Standards 2012 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We will endeavour to create and embed a culture of openness, trust and transparency across all SBCAT Schools in which the school's values and expected behaviour as set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Children in SBCAT schools will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the school's Behaviour Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, SBCAT staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with

DfE guidance "*Use of reasonable force in schools*" and staff will record incidences on CPOMS in line with the SBCAT Use of reasonable force and restrictive interventions policy.

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents and health authority.

For their own safety and protection, SBCAT staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations; for example, during musical instrument tuition, the door to the room in which the 1:1 coaching, counselling or meeting is taking place should be left open. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the meeting. All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

SBCAT school staff should be alert to behaviours that may cause 'low-level' concerns such as being over friendly with children, having favourites, taking photographs of children on their mobile phone contrary to school policy, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, humiliating pupils (see below about what a 'low-level' concern is and how to share these concerns).

SBCAT school staff should also be alert to the possible risks that might arise from social contact with pupils outside of the school. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the Headteacher and in line with the SBCAT school's home visits and home tutoring procedures. Visits/telephone calls by pupils to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the SBCAT Headteacher. Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the SBCAT Headteacher. SBCAT staff supervising off-site activities or school journeys will be provided with a school mobile phone as a point of contact for parents and carers.

SBCAT staff will only use the SBCAT school's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Headteacher and Trust Board. SBCAT staff will only use the approved school email, school learning platform or other school approved communication systems with pupils or parents/carers and only communicate with them on appropriate school business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers. SBCAT staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.

SBCAT staff should be aware of the Trust's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with their Headteacher or the DSL if the Headteacher is not available nothing should be said to the colleague involved. It should be shared with the SBCAT CEO if it relates to the Headteacher. Failure to disclose a concern if this nature about a member of staff would be regarded as that member of staff failing to follow their statutory safeguarding responsibilities which is likely to require formal challenge and follow up.

We note the non-statutory *Guidance for Safer Working Practice for professionals working in education settings* published by the *Safer Recruitment Consortium*.

20. CONTRACTORS

Building contractors who are engaged by or on behalf of an SBCAT school to undertake works on site will be made aware of this policy and the reasons for this. Long-term contractors who work regularly in an SBCAT school during term time will be asked to provide their consent for DBS checks

to be undertaken. These checks will be undertaken when individual risk assessments by the relevant member of the SBCAT school Leadership Team deem this to be appropriate. During major works, when large numbers of workers and sub-contractors may be on site during term time, Health and Safety risk assessments will include the potential for contractors or their employees to have direct access to pupils in non-teaching sessions. All contractors and sub-contractors will be issued with copies of the SBCAT school's code of conduct for staff.

Individuals and organisations that are contracted by the SBCAT school to work with or provide services to pupils will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of children regularly). Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with children. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised, or engage in regulated activity relating to children. Each SBCAT school will determine the appropriate level of supervision depending on the circumstances. If an individual working at an SBCAT school is self-employed, the school will consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

Each SBCAT school will always check the identity of contractors and their staff on arrival at the school.

21. SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING TRAINEE TEACHERS, AGENCY TEACHERS AND TEACHING ASSISTANTS, SUPPORT STAFF, VOLUNTEERS, SCHOOL GOVERNORS AND CONTRACTORS

SBCAT takes seriously all safeguarding concerns or allegations against those working in or on behalf of our schools in a paid or unpaid capacity. We will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the schools are dealt with promptly and appropriately. Procedures are in place for pupils, parents and staff to share any concern that they may have about the actions of any member of staff, including trainee teachers, supply teachers, volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the SBCAT Headteacher or the DSL if the Headteacher is not available and nothing should be said to the colleague involved. In cases where the Headteacher is the subject of the allegation or concern, they will be reported to the SBCAT CEO, in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harm threshold.
2. Allegation/concerns that do not meet the harm threshold – known as" low level concerns".

21.1 Allegations that may meet the harms threshold

The procedures, as contained in Part four of the *Keeping children safe in education*, which should be read in conjunction with Core Procedure 7 of the London Safeguarding Procedures *Allegations Against Staff or Volunteers (People in Positions of Trust), who Work with Children* are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the SBCAT school and will be used in respect of all cases in which it is alleged that anyone working in the SBCAT school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, which is known as transferable risk.

We also note that *London Safeguarding Children Procedures* state that, in addition to the above, the procedures should be applied when there is an allegation that any person who works with children, in connection with their employment, voluntary activity or personal life:

- behaves in a manner that discriminates against a child on the basis of one or more of their protected characteristics, as defined by the *Equalities Act 2010*.

The relevant Local Authority Designated Officer (LADO) should be informed of all such allegations that come to a school's attention and appear to meet the above criteria. Where an SBCAT school identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the SBCAT school will contact the relevant LA Multi Agency Safeguarding Hub (MASH) and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, the SBCAT school will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to an 'Allegations against Staff and Volunteers' (ASV) meeting/discussion being held in accordance with the DfE guidance and *Core Procedure 7 of the London Safeguarding Children Procedures*. This process will agree upon the appropriate course of action and the timescale for investigations.

The SBCAT school has a legal duty to refer to the DBS when an individual is removed from regulated activity/work with children (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity.

Where we dismiss or cease to use the services of a teacher in and SBCAT school because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Teaching Regulation Agency (TRA) as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

21.2 Concerns and/or allegations that do not meet the harms threshold – known as 'low level concerns' in KCSIE and 'concerns' in *CP7 of the LSCP 2.9-2.13*

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child does not meet the harm threshold set out above but does need reporting and reviewing. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. **However, as a good practice, SBCAT schools will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'.**

All 'low-level' concerns will be brought immediately to the attention of the relevant SBCAT Headteacher or the DSL if the Headteacher is not available and nothing should be said to the colleague involved. In cases where the Headteacher is the subject of the concern, they will be reported to the SBCAT CEO Jonathan Ronan j.ronan@sbcat.co.uk. In the cases where the CEO is

the subject of the concern they must be reported to SBCAT Chair of the Trust Board Noel Campbell *n.campbell@sbcat.co.uk*

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance "*Keeping children safe in education*" and in Chapter 7 of the *London Safeguarding Children Procedures* on *Allegations Against Staff or Volunteers (People in Positions of Trust), who Work with Children*.

22. RECORDS

Detailed and accurate written records will be kept of all incidents and child protection or child in need concerns, discussions and decisions made, and the rationale for those decisions, relating to individual pupils. This will include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc. This information may be shared directly with other agencies as appropriate. All contact with parents and external agencies will be logged and these will be kept as CP records on CPOMS. The SBCAT school will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous "secrets".

Child protection records are not open to pupils or parents. All CP records are kept securely by the SBCAT school's DSL and separately from educational records on CPOMS. They may only be accessed by the SBCAT School DSL, their Deputies and the senior managers of the school.

The content of Child Protection Conference or Review reports prepared by the SBCAT school will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carers in advance of the meeting.

Child Protection records will be sent to receiving schools separately from the main pupil file and under a confidential cover when pupils leave the SBCAT school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term ensuring secure transit and a confirmation of receipt will be obtained.

In addition to the child protection file, the SBCAT school DSL must ensure risk information (including self-harm or harmful behaviours) is shared in advance when a pupil transitions to a new setting in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

When an SBCAT school receives child protection records from other schools, they will ensure key staff such as the DSL and SENCO are aware as required.

If a pupil is withdrawn from an SBCAT school having not reached the normal date of transfer; due to a family move or any other reason, all efforts will be made to identify any new address and the school to which they are being admitted and to ensure that their educational records are sent without delay to the child's new school. If the parent/carer fails to provide this information, an urgent referral will be made to the Family Early Help Service through in order that they might make further enquiries. If an SBCAT school receives educational records concerning a child who is not registered with us, the records will be returned promptly to the sending school with a note, advising them to refer to their LA's Children's Services Department. **A child's name will only be removed from the School's Admissions Register in accordance with the DfE's statutory guidance *Working together to improve school attendance*.**

The SBCAT school will inform the Local Authority when they are about to add or delete a pupil's name from the school admission register for any reason in accordance with the relevant LA's Protocol.

When a pupil ceases to be registered at an SBCAT school and becomes a registered pupil at another school in England or Wales, the school will send a Common Transfer File (CTF) to the new school via DfE's secure data transfer website called School to School (S2S) in accordance with DfE's *School to school (S2S) guide*.

When a pupil transfers from a school in the Trust and we do not know to which school they have gone, the SBCAT school will generate CTF for each pupil using XXXXXXX for school number to indicate the destination is unknown, as per paragraph 2.4.2 of the *CTF 25 specification*. Given that schools cannot search the "lost pupils database", if a pupil arrives in an SBCAT school and we do not know the previous school, they will contact the LA's Education Data Manager who will be able to search the database for a matching record using gender, names or former names and date of birth and forward it to our school.

The SBCAT school will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. The SBCAT school will maintain accurate and up to date records of those with Parental Responsibility and emergency contacts. The SBCAT school will hold more than one emergency contact number for each pupil or student to make contact with a responsible adult when a child who is absent from education is also identified as a welfare and/or safeguarding concern. Pupils will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

The SBCAT school will take actions according to the relevant LA Protocol for children who are uncollected from school when pupils who ordinarily do not make their own way home are not collected by their parents/carers at the end of the school day or from after school clubs and activities and when any children with Special Educational Needs who are transported from school cannot be dropped-off at their home or meeting point due to the absence of the parent or carer.

SAFETY IN SCHOOLS

No internal doors to classrooms in SBCAT schools will be locked whilst pupils are present in these areas.

Entry to SBCAT school premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Each SBCAT Headteacher will use their professional judgement about the need to escort or supervise visitors such as children's relatives or other visitors attending a sports day. In the case of individuals visiting the SBCAT school in a professional capacity e.g. educational psychologists, social workers etc., we will check their ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks via a formal letter of assurance). They will be logged into and out of the premises and will be asked to wear their identity badges or be issued with school visitor badges. Unidentified visitors will be challenged by SBCAT school staff or reported to the Headteacher or school office. Any carelessness by staff not challenging unidentified visitors or supervising any entrance/exit or closing any controlled entrance will be challenged and followed up using relevant SBCAT/school policies and procedures.

The presence of intruders and suspicious strangers seen loitering near the school or approaching pupils, will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if police stop these individuals, they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to the relevant LA's Schools Safeguarding Coordinator with a view to alerting other local schools in liaison with the police and through appropriate systems.

Parents, carers or relatives may only take still or video photographic images of pupils in an SBCAT school or on school-organised activities with the prior consent of the school and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent the Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

CURRICULUM

SBCAT acknowledges the important role that the curriculum can play in the prevention of abuse, keeping students safe and in the preparation of our pupils for the responsibilities of adult life and

citizenship. We will ensure that in SBCAT schools pupils are taught about safeguarding, including online safety and will consider this as part of providing a broad and balanced curriculum. It is expected that all SBCAT school curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils will be taught, for example:

- to recognise and manage risks in different situations and then decide how to behave responsibly;
- to judge what kinds of physical contact are acceptable and unacceptable;
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help;
- to be aware what constitutes discrimination, racism and faith based/predjudice harm, sexual harassment, misogyny, toxic masculinity, online abuse, sexual violence and issues of consent and safeguarding risks, including online and AI risks (deepfakes/image manipulation/AI chatbot) and what constitutes a healthy relationship, both online and offline via a carefully planned PHSE/relationships, sex and health education curriculum.
- to use assertiveness techniques to resist unhelpful pressure;
- emotional literacy.

All computer equipment and internet access within SBCAT schools will be subject to appropriate "parental controls" and Internet safety rules in accordance with each school's Online Safety Policy, which, amongst other things, will include appropriate filtering and monitoring on school devices and school networks. We will be careful that "over blocking" does not lead to unreasonable restrictions as to what pupils can be taught with regard to online teaching and safeguarding.

SBCAT Schools will all deliver mandatory *Relationships Education, Relationships and Sex Education (RSE) and Health Education* including updates which come into force from 1 September 2026 for the academic year 2026-27. Staff will continue to challenge everyday sexism, misogyny, homophobia, 'toxic masculinity' and stereotypes and that pupils will learn in an age-appropriate way:

- How pornography can negatively influence sexual attitudes and behaviours
- How sub-cultures, such as 'incels' might influence their understanding of sexual ethics
- About the prevalence of AI-generated sexual imagery and 'deepfakes'
- The role of consent, and awareness of power dynamics
- Who they might speak to about self-harming behaviours or suicidal ideations of their self or another pupil.

Remote education

We understand the importance of keeping pupils, students and staff safe on occasions which may require pupils to learn remotely. SBCAT schools will reinforce in our contacts with parents and carers the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems the school uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they are asked to access and be clear who from an SBCAT school (if anyone) their child is going to be interacting with online. We also note the DfE guidance *Safeguarding and remote education*.

HEALTHY SCHOOLS and WELLBEING

SBCAT schools will work with partners to promote a whole, healthy, inclusive school approach and achieve the standards through the curriculum with the aim of:

- “Closing the gaps” and inequalities over time, through using the full capacity and flexibility of the curriculum to help pupils to be safe, confident, healthy, happy and active citizens
- Developing a school ethos, culture and environment as well as provision for spiritual, moral, social and cultural (SMSC) education that encourage a safe and healthy lifestyle for all children and young people, including the most disadvantaged and vulnerable.
- Providing high quality Physical Education (PE) and sport to promote physical activity and fitness.
- Promoting an understanding of the full range of issues, attitudes and behaviours which impact upon lifelong health and wellbeing, including emotional wellbeing, mental health and safety.
- Working in partnership with parents/carers, local communities, external agencies and volunteers to support the wellbeing, health and personal development of all pupils including the most disadvantaged (including those with SEND), “closing the gaps” over time.
- Ensuring that food and drink that are available across the school day reinforce the healthy lifestyle message.

WORKING IN PARTNERSHIP WITH PARENTS

It is our policy to work in partnership with parents or carers to secure the best outcomes for our children. We will therefore communicate as clearly as possible about the aims of this school.

- SBCAT schools will use clear statements in our brochures and correspondence.
- SBCAT school will liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.
- SBCAT schools will be alert to the needs of parents/carers who do not have English as their first language and will utilise the translation services as necessary.
- SBCAT schools will distribute the relevant LA’s leaflet for parents for protecting Children in Education Settings.
- SBCAT schools will make available a copy of this policy to any parent who requests it. The policy will also be available through the school’s web site.
- SBCAT schools will keep parents informed as and when appropriate.

MONITORING AND EVALUATION

The Trust Board safeguarding lead will monitor the safeguarding arrangements in the schools to ensure that these arrangements are having a positive impact on the safety and welfare of children. Safeguarding consultants will work with staff from the SBCAT school improvement team to carry out yearly safeguarding audits of all SBCAT schools. The SBCAT Safeguarding Lead, Director of School Improvement and external safeguarding consultants be used to support with the delivery of safeguarding and safer recruitment training for Headteachers/DSLs/Deputy DSLs/Trust Directors/Local Board Governors and senior staff.

SBCAT schools will be evaluated on the basis of evidence of:

- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes
- the quality of safeguarding practice, including evidence that staff are aware of the signs that children may be at risk of harm either within the setting or in the family or wider community outside the setting
- the timeliness of response to any safeguarding concerns that are raised
- the quality of work to support multi-agency plans around the child.

COMPLAINTS

All complaints arising from the operation of this policy will be considered under the Trust’s complaints policy, with reference to the Trust Safeguarding Lead/Chair of the Trust board as necessary.

_____ Chair of the Trust Board _____ Date

_____ Headteacher _____ Date

_____ Designated Safeguarding Lead _____ Date