Author	Owen Walters, Head of Safeguarding	Target group	All employees, consultants and volunteers
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Child Protection and Safeguarding Policy

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Introduction and context

Anthem Schools Trust is committed to safeguarding and promoting the welfare of children and expects every member of staff, volunteer, Trustee and Academy Community Council member to share this commitment.

Anthem Schools Trust and Mount Street Academy fully recognise their statutory responsibilities for safeguarding and child protection. All staff and volunteers are expected to share this commitment and undertake appropriate safeguarding training.

This is a statutory policy and is on every Anthem school website. The policy is based on an Anthem wide template but adapted to local context for every Anthem school.

Safeguarding is embedded throughout the work of Anthem Schools Trust and forms a central part of our Trust strategy, leadership, governance and culture. Every decision made within our schools should consider the welfare, safety and best interests of children.

Safeguarding is continually evolving. The Trust therefore reviews its safeguarding arrangements regularly to ensure they remain compliant with statutory guidance, responsive to emerging risks and informed by learning from practice.

The Trust recognises that technological developments, including artificial intelligence, continue to create both opportunities and safeguarding risks. Staff should remain alert to emerging online harms and ensure safeguarding responses evolve accordingly.

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, *Keeping Children Safe in Education* September 2026, *Working Together to Safeguard Children 2026*, the *Academy Trust Governance Guide and Children's Wellbeing and Schools Act 2026 (where applicable).* We comply with this guidance and the procedures set out by our local safeguarding partnership.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- Data (Use and Access) Act 2025
- DfE Mobile Phones in Schools guidance
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of students (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Crime and Policing Act 2026 (where applicable to safeguarding responsibilities, information sharing and regulated activity)
- Operation Encompass statutory guidance
- Information Sharing Advice for Practitioners Providing Safeguarding Services (latest version)
- Working Together to Improve School Attendance (latest version)
- Statutory guidance on Allergy Safety in Schools (where applicable)
- **Restrictive interventions, including use of reasonable force, in schools (April 2026)**
- Searching, screening and confiscation in schools (July 2023)
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

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

Terminology

Throughout this policy the term "Early Help" should be read as including "Family Help" arrangements introduced through Working Together to Safeguard Children 2026. Schools will

continue to follow the terminology, thresholds and processes implemented by their local safeguarding partnership until local arrangements transition fully.

Scope and publication

This policy applies to all staff (including agency staff), volunteers, Trustees, Academy Community Council members and national team staff working on behalf of Anthem Schools Trust. It applies whenever individuals are working with or making decisions affecting children, including when undertaking off-site activities or educational visits.

This policy is published on the school's website and can also be made available in large print or another accessible format if required.

Each Anthem school will adopt this policy annually together with a local safeguarding appendix containing school-specific safeguarding contacts, local safeguarding partnership arrangements, Family Help pathways and local escalation procedures.

The Trust Board has overall responsibility for ensuring appropriate safeguarding arrangements are in place across Anthem Schools Trust and that schools fulfil their statutory safeguarding duties. This responsibility is discharged through effective governance, leadership, monitoring and quality assurance.

The DfE defines safeguarding and promoting the welfare of children 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 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.

Safeguarding is everyone's responsibility. Effective safeguarding requires schools, families, safeguarding partners and other agencies to work together in the best interests of children, sharing information appropriately and acting without delay where concerns arise.

Children includes everyone under the age of 18.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect **specific** children who are suffering, or are likely to suffer, significant harm.

Principles

We recognise the importance of a whole school approach to safeguarding and child protection; all systems, processes and policies should operate with the best interests of the child at their heart and in accordance with local procedures. We believe that every child, regardless of age, has at all times and in all situations a right to feel safe and protected from any situation or practice which results in a child being physically or psychologically damaged. We believe that children must receive the right help at the right time to address risks and prevent issues escalating.

We believe children have the right to be listened to and involved in decisions affecting their safety, welfare and wellbeing wherever appropriate.

We fulfil this responsibility through high-quality teaching, pastoral support, safeguarding systems, effective partnership working and a curriculum that helps students recognise risk, stay safe and seek help when needed.

Equality statement

Anthem Schools Trust recognises that some children have an increased risk of abuse or additional barriers to recognising, reporting or disclosing abuse.

Staff should be particularly alert to students who:

- have SEND or medical needs;
- are looked after or previously looked after;
- have a social worker;
- are young carers;
- are experiencing mental ill health;
- are living in temporary accommodation;
- are vulnerable to exploitation;
- experience discrimination;
- are absent from education; or
- experience multiple and intersecting vulnerabilities.

Staff should avoid assumptions and consider each child's individual circumstances when assessing safeguarding concerns.

Key staff

School Designated Safeguarding Lead (DSL)

The school has appointed a Designated Safeguarding Lead (DSL) from the senior leadership team in accordance with KCSIE September 2026 guidance.

The DSL (under the Headteacher) is responsible for matters relating to child protection and welfare in this school:

Rachael Horn, Headteacher – rhorn@mountstreet.anthemtrust.uk **01522 527339**

In their absence, these matters will be dealt with by the Deputy DSL:

Sophie O'Hare, Family Support Worker – sohare@mountstreet.anthemtrust.uk **01522 527339**

Amy Paine, Assistant Headteacher – apaine@mountstreet.anthemtrust.uk **01522 527339**

Suzanna Oaten, Assistant Headteacher – soaten@mountstreet.anthemtrust.uk **01522 527339**

The DSL is key to ensuring that proper child protection and safeguarding procedures and policies are in place and adhered to. They will also act as a dedicated resource available for other staff, volunteers and Anthem Community Council (ACC) Members to draw upon. The DSL will liaise with the Local Authority and work with other agencies in line with statutory guidance *Working Together to Safeguard Children, 2026* and *Keeping Children Safe in Education*, September 2026.

The school will ensure that appropriate Designated Safeguarding Lead cover arrangements are always in place. Where the DSL is absent, unavailable or off-site, responsibility will transfer to a trained Deputy DSL. Staff will be informed of these arrangements through safeguarding notices, staff briefings and induction processes. In exceptional circumstances where neither the DSL nor Deputy DSL is immediately available, staff should seek advice from the Headteacher and continue to follow safeguarding procedures without delay.

In the absence of Rachael Horn, Designated Safeguarding Lead (DSL), or when she is off site or otherwise unavailable, all staff will be informed of the cover arrangements via email. During these times, Sophie O'Hare, Amy Paine and Suzanna Oaten will assume responsibility for safeguarding matters and act as the designated points of contact. Staff should direct any safeguarding concerns, disclosures, or queries to Sophie O'Hare, Amy Paine and Suzanna Oaten until Rachael Horn returns and resumes her DSL duties.

LA Child Protection and Safeguarding

LA Children's Social Care: Lincolnshire Children's Services

Tel: 01522 782111 (Monday to Friday, 8am to 6pm)

Emergency Duty Team (out of hours): 01522 782333

LA Designated Officer (LADO): Lincolnshire LADO Service

Tel: 01522 554674

Email: LSCP_LADO@lincolnshire.gov.uk

LA Channel Panel (Prevent): Lincolnshire Prevent / Channel Panel

Email: prevent@lincolnshire.gov.uk

Police Prevent Team: 101 (ask for the Prevent Team)

Looked-After Children

The Designated Teacher for Looked-After Children (DLAC) is:

Heather Lovett – hlovett@mountstreet.anthemtrust.uk

The DLAC has received appropriate training in accordance with the latest statutory guidance.

The DLAC will liaise with the Virtual Head for Looked-After Children to ensure that the funding assigned to the child/young person is put to best use. The role will also encompass the needs of post-LAC students. The arrangements for covering this role should the DLAC be absent or unavailable are as follows:

In the absence of Heather Lovett, or when she is off site or otherwise unavailable, all staff will be informed of the cover arrangements via email. During these times, Sophie O'Hare, Amy Paine, Suzanna Oaten will assume responsibility for safeguarding matters and act as the designated points of contact. Staff should direct any safeguarding concerns, disclosures, or queries to Sophie O'Hare, Amy Paine, Suzanna Oaten until Heather Lovett returns and resumes her DLAC duties.

Anthem contacts

Executive team member with responsibility for safeguarding:

Executive Director of Education: Elma Lawson

Head of Safeguarding: Owen Walters

Trustee Safeguarding Champion: Mark Kamlow

Roles and responsibilities

All staff and volunteers (including school staff, national team staff, Trustees and ACC members)

All staff have a responsibility to safeguard children and must recognise that safeguarding is not solely the responsibility of the Designated Safeguarding Lead.

Every member of staff is expected to:

- maintain professional curiosity and identify safeguarding concerns at the earliest opportunity;
- record concerns promptly, accurately and factually in accordance with Trust procedures;
- share safeguarding concerns immediately using the school's safeguarding recording system;
- recognise that seemingly low-level concerns may form part of a wider safeguarding picture;
- escalate concerns and professionally challenge decisions where they believe a child remains at risk; and
- contribute to a positive safeguarding culture across the school.

All staff and volunteers must read and understand Part One of Keeping Children Safe in Education and confirm annually that they have done so. Staff will also be made aware of the safeguarding information and procedures relevant to their role. Staff who work directly with children should also be familiar with the safeguarding information in Part Five where relevant to their role.

Staff must understand that safeguarding responsibilities extend beyond the school site and beyond the school day. Concerns arising online, during educational visits, extra-curricular activities, transport, work experience, alternative provision or through community intelligence should be considered within the school's safeguarding arrangements.

All staff and volunteers will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Trustees, Executive Team members, the Head of Safeguarding, members of the School Leadership Teams, DSLs and their deputies, ACC Safeguarding Champion, and members of the National Team should read the document in its entirety.

All staff and volunteers will be aware of:

- Our systems which support safeguarding, including this child protection policy (including procedures for dealing with child-on-child abuse), the relevant Code of Conduct, the role and identity of the DSL and deputy/deputies, the Online Safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, the Behaviour & Ethos Policy, and the safeguarding response to children who go missing from education.
- the school's procedures for seeking Early Help/Family Help and making referrals to Children's Social Care.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE),

Domestic Abuse, indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).

- Mental Health problems and how in some cases they are an indicator of the child being at risk of harm.
- The terms victim and perpetrator ensuring they recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way thus using a term that the child is comfortable with; equally for alleged perpetrator(s)/perpetrators thinking carefully about what terminology is used (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. (As a school we will decide what's appropriate and which terms to use on a case-by-case basis).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children and thus will provide a safe space for these students to speak out and share their concerns.

All new staff and volunteers will receive basic safeguarding training as part of their induction and be expected to read and understand the Child Protection and Safeguarding Policy.

Unless otherwise stated below, all role holders are expected to fulfil the responsibilities set out in the "All Staff and Volunteers" section in addition to their role-specific duties.

DSL

The DSL is a member of the senior leadership team. As set out above, our DSL is **Rachael Horn, Headteacher**. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.

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

When the DSL is absent, the Sophie O'Hare – will act as cover. Amy Paine – will act as cover. Suzanna Oaten – will act as cover.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- The DSL will actively challenge decisions made by professionals or agencies where the DSL believes a child remains at risk. This includes use of the local escalation or professional disagreement protocols. The DSL should demonstrate professional curiosity and healthy challenge during multi-agency working, escalating concerns where decisions do not sufficiently safeguard children.
- Ensure that appropriate referrals are made to the relevant agencies and bodies, including local authority children's social care, the police, Channel and, where applicable, the Disclosure and Barring Service and Teaching Regulation Agency.

- Be aware of the arrangements for ensuring that a child has access to an appropriate adult where required during a police investigation, interview or search.
- The DSL will ensure that staff receive appropriate Prevent training and understand the school's arrangements for identifying and responding to concerns about radicalisation and extremism.

The DSL will also:

- Keep the Headteacher and the Head of Safeguarding informed of any issues, in line with the Escalation Checklist.
- Liaise regularly with the ACC Safeguarding Champion.
- Attend regularly and contribute to the Anthem DSL forums.
- Prepare for and support Trust safeguarding quality assurance activity, including safeguarding Deep Dives and external safeguarding reviews.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Oversee implementation of filtering and monitoring arrangements in partnership with school leaders and IT providers.

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

The DSL and their deputy must undertake child protection training and training in inter-agency working every two years (or more regularly) and will attend annual refreshers provided by the LA/MAP to remain updated on policy, procedures and developing concerns nationally and regionally.

Quality Assurance

The DSL will routinely review safeguarding records, referrals and plans to ensure decisions remain child-centred, thresholds are applied consistently, actions are completed promptly and safeguarding records accurately reflect professional decision-making.

Strategic Leadership of Safeguarding

In addition to managing individual safeguarding concerns, the DSL provides strategic leadership by:

- evaluating safeguarding trends;
- identifying emerging risks;
- quality assuring safeguarding practice;
- overseeing safeguarding training;
- monitoring safeguarding culture; and
- reporting safeguarding information to senior leaders and ACCs.

The DSL will ensure safeguarding data is analysed regularly to identify emerging safeguarding themes, vulnerable cohorts, repeat concerns, attendance-related safeguarding risks, child-on-child abuse trends, online safety trends, mental health concerns, and indicators of exploitation. This analysis will be used to inform safeguarding practice, target support effectively, and ensure that emerging risks are identified and responded to in a timely manner.

Anthem Schools Trust recognises the emotional impact of safeguarding work. DSLs and other safeguarding professionals will have access to safeguarding supervision in accordance with Trust arrangements. Supervision supports reflective practice and professional resilience and complements, but does not replace, line management or statutory safeguarding responsibilities.

The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction; and
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff and volunteers undertake appropriate safeguarding and child protection training, including online safety training, and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate. Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and/or Head of Safeguarding on this.
- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.
- Overseeing the safe use of technology, mobile phones and cameras in the Early Years setting.
- Ensuring the school has at least two emergency contact details for each student.
- Ensure filtering and monitoring standards are met and reviewed annually.

The Headteacher is responsible for ensuring safeguarding remains a strategic priority across the school and that safeguarding considerations inform leadership decisions, staffing, curriculum, behaviour, attendance, SEND provision and school improvement planning.

The Headteacher will ensure sufficient time, funding, supervision and administrative support are provided to enable the DSL to fulfil their statutory responsibilities effectively.

The Headteacher will receive regular safeguarding assurance from the DSL, including safeguarding trends, quality assurance findings, serious incidents and emerging risks.

Head of Safeguarding

The Head of Safeguarding provides strategic leadership for safeguarding across Anthem Schools Trust.

Responsibilities include:

- developing Trust safeguarding strategy
- monitoring safeguarding performance across schools
- undertaking safeguarding reviews
- completing safeguarding quality assurance
- analysing Trust safeguarding data
- supporting DSLs
- advising Executive Leaders and Trustees
- overseeing safeguarding training
- monitoring statutory compliance
- coordinating serious safeguarding incidents
- supporting schools during inspections
- developing safeguarding resources
- promoting continual safeguarding improvement.

The Head of Safeguarding may provide professional challenge where safeguarding practice requires improvement and may escalate concerns directly to Executive Leaders where safeguarding risks remain unresolved.

Anthem Executive Director of Education

The Executive Director of Education:

- receive safeguarding reports
- provide strategic challenge
- undertake safeguarding visits
- monitor implementation of safeguarding actions
- review safeguarding data
- seek assurance regarding safeguarding culture
- report safeguarding matters to Trustees.

ACC Safeguarding Champion

The ACC Safeguarding Champion is responsible for ensuring that safeguarding is at the forefront of everyone's minds in all the work that the ACCs do. The ACC Safeguarding Champion will:

- Be familiar with the school's policy, procedures and reported data in relation to child protection, safeguarding and wellbeing.
- Meet with the DSL once a term to check in, support with the Anthem Safeguarding Deep Dive actions and act as a sounding board for the DSL.

- Act as a link between the DSL and the ACC.
- At ACC meetings, keep safeguarding at the forefront of the ACC's collective mind as matters are discussed and remind others of how those matters might impact the safety and wellbeing of students.
- Ask the DSL, Headteacher and Head of Safeguarding questions about the status of actions arising from the internal safeguarding deep dives and external audits of safeguarding at their school.
- Raise any concerns they may have about safeguarding in line with the school's Child Protection and Safeguarding Policy as appropriate. Refer other people to this policy as appropriate.
- Encourage ACC colleagues to recognise and be aware of safeguarding issues at all times.
- Suggest further advice is sought from the DSL or Head of Safeguarding where appropriate.

ACC Safeguarding Champions are not expected to be experts in safeguarding, nor do they hold any formal or legal responsibility for safeguarding practice in the school. Specifically, they are not responsible for the following:

- Responding to queries about safeguarding at the school.
- Directly investigating or making enquiries into safeguarding matters.
- Checking the Single Central Register.
- Conducting safeguarding audits at the school.
- Signing off any safeguarding-related policies or documents.
- Representing the school or the Trust during an Ofsted inspection.

Further detail about the ACC Safeguarding Champion role is set out within the ACC Safeguarding Champion Role Description.

Trustee Safeguarding Champion

The Trustee Safeguarding Champion provides independent strategic oversight of safeguarding across Anthem Schools Trust.

This includes:

- receiving Trust safeguarding reports
- monitoring statutory compliance
- challenging safeguarding performance
- reviewing safeguarding audit outcomes
- monitoring serious safeguarding incidents
- receiving assurance regarding safeguarding quality improvement
- receive assurance that filtering and monitoring standards are effective across the Trust.
- reporting safeguarding matters to the Full Board
- receive assurance that appropriate cyber security arrangements are in place to protect students, staff, safeguarding information and Trust systems from cyber threats.

Use of Safeguarding Data

Safeguarding data should be used proactively to improve practice rather than solely for compliance purposes.

Schools should routinely review safeguarding information to identify:

- emerging risks
- vulnerable cohorts
- repeat concerns
- attendance patterns
- exploitation indicators
- safeguarding training needs
- quality assurance priorities.

Trust-wide safeguarding analysis will be undertaken regularly to identify themes, provide assurance and inform continuous improvement.

Additional contact information

NSPCC helplines

Main contact: 0808 800 5000 (help@nspcc.org.uk)

ChildLine: 0800 1111

FGM direct line: 0800 028 3550

Gangs direct line: 0808 800 5000

Whistleblowing advice line: 0800 028 0285

Forced Marriage Unit

020 7008 0151 (fmu@fco.gov.uk)

Tackling Extremism and Radicalisation (Prevent)

counter.extremism@education.gov.uk

020 7340 7264

Recognising and responding to safeguarding concerns

Recognising abuse and taking action

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

- Has a disability
- 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 education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent or harmful behaviour
- Has been repeatedly removed from the classroom, is on a part-time timetable, is at risk of permanent exclusion, or is receiving education in Alternative Provision or a Pupil Referral Unit

Staff (including temporary staff) and volunteers must follow the procedures set out below in the event of a safeguarding issue.

Where a staff member or volunteer has a concern and the DSL or DDSL cannot be located or where the staff member feels the response from the DSL/DDSL is inadequate, the staff member **MUST** refer the case into Social Care using the processes and procedures below.

If a child is in immediate danger

If a child is in immediate danger, or there is an immediate risk of serious harm, contact the police on 999 where appropriate. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, an immediate referral must be made to local authority children's social care in accordance with local safeguarding procedures. Staff must not delay action while attempting to contact the DSL. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly. Concerns should always be shared promptly, regardless of whether they appear significant in isolation. No concern should be dismissed as insignificant, as seemingly low-level concerns may form part of a wider safeguarding picture.

Where there are concerns about a child's welfare or where a child may be suffering, or is likely to suffer, significant harm, staff must immediately report their concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL. The DSL will consider the concern and, where appropriate, make a referral to Lincolnshire Children's Services without delay.

Referrals to Lincolnshire Children's Services should be made by telephone on 01522 782111 (Monday to Friday, 8:00am to 6:00pm). Outside of these hours, urgent safeguarding concerns should be referred to the Emergency Duty Team on 01522 782333.

Any member of staff may make a referral directly to Children's Services if they believe a child is at risk of immediate harm or if they feel that appropriate action has not been taken following the reporting of a concern. Staff should inform the DSL that a referral has been made unless doing so would place the child at increased risk of harm.

The setting will work in partnership with Lincolnshire Children's Services and other agencies to support children and families and will contribute fully to child protection conferences, child in need meetings, early help assessments, and any other multi-agency safeguarding arrangements as required.

Further information on reporting child abuse to the local authority can be found at:

https://www.gov.uk/report-child-abuse-to-local-council

If a child makes a statement or allegation of abuse to you

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

- **Listen carefully and believe the child.** Allow them to speak freely and do not ask leading, probing or investigative questions.
- **Remain calm and reassuring.** Do not express shock, disbelief or judgement.
- **Reassure the child** that they have done the right thing by telling you, that you are taking what they have said seriously, and that the abuse is not their fault. Do not suggest they should have disclosed sooner.
- **Explain what will happen next.** Be honest that you will need to share the information with people who can help keep them safe. Never promise confidentiality.
- **Record the disclosure as soon as possible** on **CPOMS**, using the child's own words wherever possible. Record only what was seen, heard or said, avoiding assumptions or personal opinion. Include the date, time, location, those present and any actions taken.

- **Inform the DSL or a DDSL immediately.** Where the concern is urgent or there is an immediate risk of harm, staff must speak to the DSL/DDSL **in person** (or by telephone if they are off-site) and must not rely solely on a CPOMS entry or email.
- **If the child is at immediate risk of significant harm and the DSL/DDSL is unavailable**, make a referral directly to Children's Social Care and/or the police without delay, and inform the DSL/DDSL as soon as possible afterwards.
- **Maintain confidentiality.** Only share the information with those who need to know in order to safeguard the child or where required by law or statutory safeguarding procedures.
- **Avoid asking the child to repeat their account unnecessarily.** Repeated questioning can be distressing and may compromise subsequent enquiries. Ensure the child receives appropriate support whilst safeguarding procedures are followed.

Bear in mind that some children may:

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

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

Staff should remain professionally curious, particularly where:

- explanations are inconsistent or change over time;
- injuries are unexplained or inconsistent with the explanation provided;
- attendance deteriorates, persistent absence develops or a child becomes missing from education;
- behaviour, presentation or emotional wellbeing changes significantly;
- repeated low-level concerns begin to form a pattern;
- there are indicators of neglect or cumulative harm; or
- the child, family or circumstances give rise to a professional sense that "something isn't right".

Staff should avoid seeking further detail beyond what is necessary to establish immediate safety, recognising that detailed questioning may compromise future enquiries.

Action by the Designated Safeguarding Lead – concerns about students

The action to be taken by the DSL will take into account:

- The local inter-agency procedures of the Lincolnshire Safeguarding Partnership.
- The nature and seriousness of the suspicion or allegation. An allegation involving a serious criminal offence will always be referred to children's social care or the Police. In case of serious harm, the Police will be informed from the outset.
- The wishes of the student who has made the allegation, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a student's wishes.

- The wishes of the student's parents /carers provided they have no interest which is in conflict with the student's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents/carers would put a child at risk; s/he will take further advice from the relevant professionals before making a decision to disclose; and
- Duties of confidentiality, so far as applicable (and as referenced above)

Decision-making should be clearly evidenced within safeguarding records, including:

- rationale
- threshold applied
- consultation undertaken
- actions agreed
- review arrangements.

When determining the appropriate safeguarding response, the DSL will consider all available information, including the child's wishes and feelings, previous safeguarding history, cumulative and contextual risks, protective factors, previous agency involvement and both the immediate and longer-term level of risk. Decisions, rationale and agreed actions will be clearly recorded on CPOMS.

Referral

Where safeguarding concerns meet statutory thresholds, referrals will be made promptly to Children's Social Care in accordance with local safeguarding partnership arrangements.

Schools should not delay referrals whilst gathering additional evidence where there is reasonable cause to suspect a child is suffering or likely to suffer significant harm.

Where there is uncertainty about whether the threshold for a referral has been met, the DSL may seek advice from Children's Social Care. Consultation must not delay a referral where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Telephone referrals should be confirmed in writing in accordance with local safeguarding partnership procedures. Where the school remains concerned about a child, professional challenge and local escalation procedures should be used where necessary.

If the DSL disagrees with decisions made by another agency and believes a child remains at risk, professional challenge and escalation procedures should be used in accordance with local safeguarding partnership arrangements. Schools should use local professional disagreement or escalation procedures where they believe decisions made by partner agencies do not adequately safeguard a child.

Early Help/Family Help

Where a child would benefit from additional support but is not suffering, or likely to suffer, significant harm, the Designated Safeguarding Lead (DSL) should consider whether **Early Help/Family Help** is the most appropriate response.

The DSL will normally coordinate the school's involvement in Early Help/Family Help and work with other agencies to ensure children and families receive appropriate support at the earliest opportunity.

The school will actively participate in Early Help/Family Help arrangements, ensure the child's voice is represented, share information appropriately with partner agencies, regularly review the effectiveness of support and escalate concerns where risk increases or circumstances do not improve.

Early Help/Family Help must never delay statutory safeguarding action where thresholds for Children's Social Care intervention have been met.

The outcome of all referrals, including the threshold applied, decision-maker, agreed actions, review arrangements and timescales, must be clearly recorded on CPOMS.

Reporting and recording

It is the responsibility of all staff and volunteers to report any safeguarding concern immediately to the DSL or a DDSL.

All safeguarding concerns, disclosures, allegations, incidents and actions must be recorded on CPOMS as soon as possible and, wherever practicable, before the end of the working day.

Where a concern is urgent or a child is at immediate risk of significant harm, staff must inform the DSL/DDSL in person (or by telephone if they are off-site) and must not rely solely on a CPOMS entry or email.

Safeguarding records should:

- be recorded promptly on CPOMS using the appropriate category;
- use the child's own words wherever possible;
- distinguish clearly between fact, observation, opinion and professional judgement;
- be clear, concise, accurate and objective;
- include the date, time, location and those present;
- record any injuries observed, using a body map where appropriate;
- include any actions taken, decisions made and the rationale for those decisions; and
- identify who has been informed, including the DSL/DDSL and any external agencies.

Staff should never delay recording a concern because they are uncertain whether it meets a safeguarding threshold. Seemingly low-level concerns may form part of a wider safeguarding picture and should always be recorded and shared.

Record-keeping

Safeguarding records will be maintained securely in accordance with the Trust's Records Retention Policy, the Data Protection Act 2018 and UK GDPR.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded on CPOMS. This should include instances where referrals were or were not made to another agency such as Children's Social Care or the Prevent programme etc., If staff are unsure whether a concern should be recorded, they should always discuss this with the DSL/DDSL.

Records will include:

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

Safeguarding records should be factual, objective, accurate, timely, child-centred and free from opinion unless clearly identified as professional judgement.

Records should distinguish clearly between observed facts, direct quotations, professional analysis and agreed actions.

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

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

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

- Five days for an in-year transfer.

or

- Within the first five days of the start of a new term.

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

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

Professional Analysis

Where appropriate, safeguarding records should include professional analysis explaining why the concern is significant, the safeguarding risks identified, any protective factors, the rationale for decisions made and the planned next steps.

Confidentiality and information sharing

The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe except in circumstances where damage may be done to a person or group of people; 'this includes allowing practitioners to share information without consent…' (KCSIE Sept 2026 paragraph 118). 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, and where appropriate the school will seek advice from Anthem Trust.

Information should be shared lawfully, proportionately and on a need-to-know basis in accordance with the Data Protection Act 2018, UK GDPR and statutory safeguarding guidance.

The school will ensure that all child protection records are kept confidential and only allow disclosure to those who need the information in order to safeguard and promote the welfare of children. The school will cooperate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Where a child leaves the school, the DSL will ensure that the child protection file is transferred securely and separately from the main pupil file as soon as possible. This transfer will normally take place within 5 school days for an in-year transfer and within the first 5 school days of a new term where the child moves schools during a holiday period. Consideration will also be given to sharing relevant safeguarding information in advance where this is necessary to protect the child.

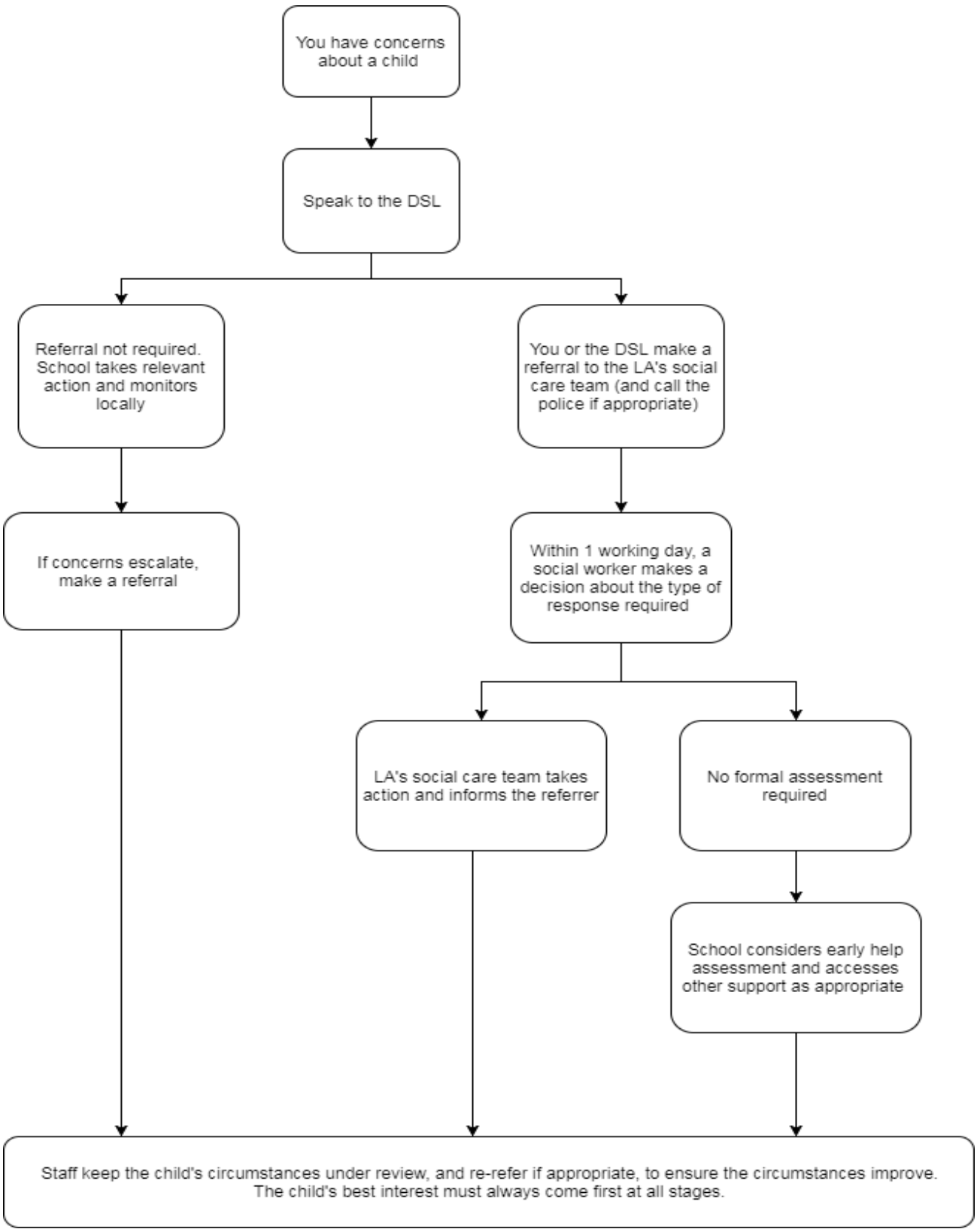
Concerns and complaints about safeguarding

We take concerns about the effectiveness of our safeguarding arrangements seriously. Concerns about safeguarding practice, systems or the way a safeguarding matter has been handled should be raised through the Concerns and Complaints Policy and will be considered promptly and appropriately.

Where a complaint or concern relates to the conduct of a member of staff and may meet the harm threshold, it must be managed in accordance with the Trust Allegations Against Staff Policy rather than through the ordinary complaints process.

Where a concern is raised about safeguarding practice and the person raising it believes that appropriate action has not been taken, the matter should be escalated through the school's complaints procedure and, where appropriate, to the Trust in accordance with established escalation arrangements.

Flowchart for procedures if you have concerns about a student's welfare (no immediate danger)



Significant Safeguarding Incident (SSI)

The purpose of a Significant Safeguarding Incident (SSI) is to ensure that Anthem Schools Trust is notified promptly of safeguarding incidents that present a significant safeguarding risk, require Trust-level oversight or support, or present a serious operational, reputational or strategic risk to the school or Trust.

An SSI does not replace routine safeguarding recording or case management on CPOMS. All safeguarding concerns must continue to be recorded and managed in accordance with this policy. The SSI process is used to ensure that the Trust is aware of incidents requiring immediate oversight, support or quality assurance.

A SSI will normally include:

- any safeguarding incident requiring an immediate telephone referral to Children's Social Care and/or immediate police involvement because a child is suffering, or is likely to suffer, significant harm;
- allegations or concerns involving serious sexual abuse or sexual violence;
- suicidal ideation, suicide attempts or self-harm where there is evidence of significant risk, a credible intention to act, emergency intervention, referral to specialist crisis services, or other circumstances requiring immediate Trust oversight;
- high-risk Female Genital Mutilation (FGM) concerns;
- high-risk Prevent concerns;
- significant police incidents involving students (for example, weapons, serious violence, illegal drugs or hate crime);
- student pregnancy where there are safeguarding concerns or significant risk factors; and
- incidents where a student has been reported missing and there are significant safeguarding concerns.

Not every safeguarding concern relating to suicide or self-harm will meet the threshold for notification as a SSI. All expressions of suicidal thoughts or self-harm must be taken seriously, responded to in accordance with the school's safeguarding procedures, appropriately risk assessed and recorded on CPOMS. An SSI notification should only be submitted where the circumstances indicate a significant safeguarding risk, immediate danger, emergency intervention, or where Trust-level awareness, advice or oversight is required.

Passing, impulsive or throwaway comments which, following an appropriate safeguarding assessment, are not considered to indicate genuine suicidal ideation or significant risk would not normally require an SSI notification. However, they must still be taken seriously, recorded on CPOMS, appropriately risk assessed, shared with the DSL/DDSL and kept under review.

The Head of Safeguarding must be notified of any SSI using the CPOMS "SSI" category as soon as possible. This enables timely Trust oversight, advice and support. Schools should cooperate with any follow-up requests for information, quality assurance or review.

SSIs will normally be overseen by the Head of Safeguarding and, where appropriate, the Directors of Education. Incidents may be subject to additional quality assurance, safeguarding review or lessons learned activity to strengthen safeguarding practice across the Trust.

Following every SSI, schools should consider whether the incident identifies wider safeguarding risks, learning or improvements to policy, procedures, training or practice.

If you discover that FGM has taken place, or a student is at risk of FGM

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

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

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix 2 of this policy.

Any teacher who either:

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

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

Staff should recognise that concerns relating to so-called honour-based abuse may involve multiple safeguarding risks including forced marriage, domestic abuse, emotional abuse and coercive control.

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

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

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

Any member of staff who suspects a student is at risk of Female Genital Mutilation (FGM) or suspects/is made aware that FGM has been carried out must immediately report their concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL and follow the setting's safeguarding and child protection procedures.

The DSL will assess the information and, where appropriate, make an immediate referral to Lincolnshire Children's Services and/or the Police. Where a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they have a statutory duty to report this directly to the Police and must do so as soon as possible.

All concerns relating to FGM will be treated as child protection concerns. The setting will work closely with Lincolnshire Children's Services, health professionals, the Police, and other relevant agencies to safeguard the child and any other children who may be at risk. Records of concerns, disclosures, discussions, and referrals will be kept securely in accordance with the setting's safeguarding procedures.

If you have concerns about a child (as opposed to a child being in immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger on page 25.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the Anthem Head of Safeguarding or the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

If you have concerns about extremism

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

Staff should recognise that radicalisation can occur both online and offline and may involve increasingly sophisticated use of social media, gaming platforms, messaging applications and artificial intelligence technologies.

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and ACC members can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

Reporting systems for our students

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

To achieve this, we:

- Have systems in place for students to confidently report abuse.

- Promote our reporting systems and ensure they are easily understood and are easily accessible for students.
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Pupils are encouraged to speak to a trusted adult if they have a worry, concern, or feel unsafe. All pupils identify adults in school whom they feel comfortable talking to about any concerns. Our safety owl is a key learning tool and helps children to know and understand safety, who keeps them safe and how.
- All pupils are made aware that they can speak to Rachael Horn, the Designated Safeguarding Lead (DSL), at any time and that safeguarding concerns will always be taken seriously. Information about reporting concerns is regularly reinforced through circle time, assemblies, safeguarding discussions, and the wider personal development curriculum.
- The school promotes a culture where pupils feel safe, listened to, and respected. Children are reassured that they will be supported if they raise a concern and that they have done the right thing by speaking out. Following any disclosure or allegation, appropriate support will be provided, and the child's welfare will remain the school's primary concern. Pupils are encouraged to continue sharing concerns and are reminded that no worry is too small to discuss with a trusted adult.

Home visits

Home visits may be carried out as part of early help, attendance and absence monitoring, welfare checks, or when there are safeguarding concerns. All home visits are risk assessed in advance, recorded, and conducted by staff in line with the school's safeguarding procedures and Anthem guidance.

Where possible, home visits will be pre-arranged. Staff conducting home visits must follow the Home Visits policy and the guidance set out in the Anthem Schools Trust Safeguarding Handbook and Anthem Attendance Ambitions document, ensure their visit is logged on CPOMS, and inform the DSL of any safeguarding concerns arising from the visit.

All staff must remember that the same safeguarding responsibilities apply during home visits as on school premises.

Home visits must be recorded appropriately, including the purpose of the visit, those present, observations made, any safeguarding concerns identified and agreed actions.

Risk Assessment

Prior to home visits schools should consider:

- known safeguarding concerns
- domestic abuse
- aggression
- environmental risks
- lone working
- medical needs

- language requirements
- previous incidents.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

If you have a concern about mental health

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

Staff should recognise that whilst poor mental health is not itself a safeguarding concern, it may:

- indicate abuse
- increase vulnerability
- increase risk of exploitation
- contribute towards safeguarding concerns requiring multi-agency intervention.

Staff will be alert to behavioural signs that suggest a student may be experiencing a mental health problem or be at risk of developing one.

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

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

The school recognises that mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. The school takes a proactive approach to promoting positive mental health and emotional wellbeing for all pupils. Sophie O'Hare (Family Support Worker) is the school's Mental Health Lead. Sophie O'Hare is Youth Mental Health First Aid trained and work closely together to support pupils experiencing mental health difficulties. The school is a THRIVE school and uses the THRIVE Approach to help identify needs, build resilience, and provide targeted emotional support.

Staff are expected to remain vigilant to signs that a pupil may be experiencing mental health difficulties. Where concerns arise, staff must complete a Pastoral Support Request Form and submit this to Sophie O'Hare. Sophie O'Hare will liaise with SLT to review the concerns, assess any risks,

and develop an appropriate support plan in partnership with the child, family, and relevant professionals.

The school works closely with parents and carers and, where appropriate, referrals may be made to external agencies including Healthy Minds and CAMHS (Child and Adolescent Mental Health Services). Sophie O'Hare is responsible for making these referrals and coordinating support. The school also consults regularly with the Mental Health Support Team (MHST) through six-weekly consultation meetings to ensure pupils receive appropriate advice, intervention, and support.

Mental health concerns are considered alongside safeguarding needs. Any concerns relating to self-harm, suicidal ideation, or behaviours that indicate a significant risk to a pupil's safety will be treated as a safeguarding emergency. In such circumstances, the Designated Safeguarding Lead will be informed immediately, parents/carers will be involved where appropriate, referrals will be made to relevant services without delay, and an immediate risk assessment and safety plan will be put in place.

The school will continue to monitor and review pupils' mental health needs and work collaboratively with families, external agencies, and safeguarding partners to ensure children receive the right support at the right time.

Vulnerable groups and specific safeguarding issues

Staff should recognise that vulnerability is dynamic rather than fixed. A student's level of vulnerability may change over time because of changes in their family, education, health, peer relationships or wider community. Vulnerability should therefore be reviewed regularly and should not be determined solely by category or label.

Children with special educational needs, disabilities or certain health conditions

We recognise that students with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the student's condition without further exploration;
- students being more prone to peer-group isolation or bullying, including prejudice-based bullying;
- the potential for students with SEN, disabilities or certain health conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing signs; and
- communication barriers or difficulties in recognising, reporting or communicating safeguarding concerns.

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

The school recognises that children with Special Educational Needs and Disabilities (SEND), disabilities and certain health conditions can face additional safeguarding challenges and may be more vulnerable to abuse, neglect, exploitation, bullying, mental health difficulties, and peer-on-peer abuse. Staff are aware that additional barriers can exist when recognising abuse and neglect in these pupils and will remain vigilant to any indicators that cause concern.

In line with the school's SEND policy and inclusive ethos, Mount Street Academy is committed to ensuring that all pupils are listened to, supported, and protected. The school works closely with pupils, families, external professionals, and agencies to ensure that individual needs are understood and appropriate support is provided.

Heather Lovett, SENDCO and Mental Health Lead, works alongside Rachael Horn, Designated Safeguarding Lead (DSL), to ensure that pupils with SEND, disabilities, and medical needs receive appropriate pastoral and safeguarding support. Information is shared between safeguarding and SEND teams to ensure that barriers to learning, wellbeing, and safety are identified and addressed promptly.

As a THRIVE school, Mount Street Academy uses the THRIVE Approach to identify social and emotional developmental needs and to provide targeted support. Additional pastoral support may include regular check-ins with trusted adults, tailored emotional wellbeing interventions, THRIVE assessments and action plans, nurture-based strategies, support from the Mental Health Lead, and referrals to external agencies where appropriate.

The school recognises that communication difficulties may make it more challenging for some pupils to recognise, understand, or report concerns. Staff therefore use a range of approaches to support communication, including visual prompts, social stories, adapted language, one-to-one conversations, trusted adult relationships, and opportunities to communicate concerns. Staff take extra care to establish pupils' wishes, feelings, and views and ensure these are considered in all safeguarding decisions.

All pupils identify trusted adults within school whom they can approach if they are worried or need support. Pupils with SEND are provided with additional opportunities to build these relationships and are reminded regularly that they can speak to Rachael Horn (DSL) or any trusted adult at any time.

Where safeguarding concerns arise for a pupil with SEND, disabilities, or relevant health conditions, the school will ensure that support plans, risk assessments, and interventions are tailored to meet the individual's needs. The school will work closely with parents/carers, health professionals, social care, and other agencies to provide coordinated support and promote positive outcomes for the child.

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

Staff should avoid making assumptions that changes in behaviour, presentation or communication are solely attributable to a student's SEND or medical condition.

Safeguarding concerns should always be considered alongside any known disability or health need, recognising that children with SEND may experience multiple barriers to recognising, reporting or communicating abuse.

Where appropriate, safeguarding planning should involve the SENCO, relevant health professionals, external agencies, parents/carers and the child. Schools should consider whether reasonable adjustments are required to enable students to disclose concerns safely, including the use of visual communication aids, interpreters, assistive technology or trusted adults.

Students with a social worker

Schools recognise that children with a social worker may experience significant safeguarding challenges regardless of whether they are subject to Child Protection Plans, Child in Need Plans or Family Help arrangements.

Staff should recognise that having a social worker may indicate that a student has additional safeguarding or welfare needs and should take this into account when making professional decisions.

The DSL should ensure effective communication is maintained with allocated social workers and should routinely review safeguarding plans to ensure school-based support remains appropriate.

Where the school is aware that a student has a social worker, the DSL should take this into account when considering the student's safety, welfare and educational outcomes. This may inform decisions about unauthorised absence or missing education where there are known safeguarding risks, and the provision of appropriate pastoral or academic support.

Young carers

A young carer is a child or young person under the age of 18 who provides care, assistance or support to a family member because of a physical disability, mental health condition, chronic illness, substance misuse or another significant need.

Young carers may experience increased risks to their mental health, attendance, social relationships and educational achievement. Schools should identify young carers as early as possible and ensure their caring responsibilities are considered when assessing safeguarding and support needs.

Schools should:

- identify and appropriately support young carers, including those whose caring responsibilities may not yet be recognised;
- include young carers within the school's Vulnerable Student Tracker (VST), where appropriate;
- work sensitively with the child, parents/carers and relevant agencies to understand the impact of caring responsibilities;
- consider referrals to local young carers services, Family Help or other agencies where appropriate; and
- provide appropriate pastoral, academic or other support and ensure the child's voice is heard.

Possible indicators of a young caring role may include persistent lateness or absence, fatigue, anxiety, reduced participation, difficulties with homework or emotional distress.

Looked-after children, previously looked-after children & those cared for under a kinship care arrangement

We will ensure that staff understand the additional safeguarding and welfare needs that may affect looked-after children, previously looked-after children and children cared for under kinship care arrangements.

Relevant staff will have access to the information they need about the child's care arrangements, legal status and contact arrangements, and the DSL will maintain appropriate contact details for the child's social worker and relevant Virtual School Head.

We have appointed a designated teacher, Heather Lovett, who is responsible for promoting the educational achievement of looked-after children, previously looked-after children and those who are cared for under a kinship care arrangement in line with statutory guidance.

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

As part of their role, the designated teacher will:

- work closely with the DSL to ensure safeguarding concerns relating to looked-after and previously looked-after children are identified and responded to promptly;
- work with the Virtual School Head and relevant professionals to promote the educational achievement and wellbeing of looked-after and previously looked-after children, including making effective use of Pupil Premium Plus where applicable.

The Designated Teacher and DSL should work together to ensure that educational, emotional and safeguarding needs are considered together.

Safeguarding planning should recognise the potential impact of trauma, instability, attachment difficulties and previous adverse childhood experiences.

Where children become looked after or enter kinship care during the academic year, safeguarding records should be reviewed promptly to ensure support arrangements remain appropriate.

Vulnerable Student Tracker (VST)

Each school must maintain a Vulnerable Student Tracker (VST) which is reviewed at least weekly by the safeguarding team. The tracker will identify students who are vulnerable or at risk, using a RAG-rating system to highlight concerns. It should also capture risk assessments, external professional involvement, and referrals made.

The VST must be reviewed at least weekly by the safeguarding team and following any significant change in a student's circumstances or significant safeguarding incident, to ensure that risk levels remain accurate and support remains proportionate.

VST reviews should consider, where relevant: attendance; safeguarding incidents and concerns; behaviour and suspensions; mental health and wellbeing; SEND; contextual safeguarding risks; family circumstances; agency involvement; Section 47 enquiries; Child Protection Conferences; Child in Need meetings; and Family Help reviews.

Students who are lesbian, gay or bisexual and children who are questioning their gender

A child or young person being lesbian, gay or bisexual is not in itself a risk factor for harm. However, they may be vulnerable to discriminatory bullying or other safeguarding concerns. A child who is perceived by other children to be lesbian, gay or bisexual may be similarly vulnerable, whether or not they identify in this way. Staff should respond to individual circumstances and take appropriate action to prevent and address bullying or other safeguarding concerns.

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

The school recognises that LGBTQ+ pupils may be more vulnerable to bullying, discrimination, social isolation, and poor mental health. We are committed to providing a safe, inclusive, and supportive environment where all pupils feel valued, respected, and able to be themselves. Any concerns regarding the wellbeing, safety, or mental health of an LGBTQ+ pupil should be reported to the Designated Safeguarding Lead (DSL), Rachael Horn. Concerns will be responded to sensitively, taking account of the pupil's wishes, feelings, privacy, and individual circumstances.

Pastoral support for LGBTQ+ pupils is led by Sophie O'Hare (DDSL and Mental Health Lead), to ensure that pupils receive appropriate emotional wellbeing and safeguarding support. Support may include regular check-ins with a trusted adult, access to THRIVE interventions, emotional wellbeing support, support with friendships and peer relationships, mental health referrals where appropriate, and liaison with families where this is in the best interests of the child.

All staff promote an inclusive culture and challenge any discriminatory language, bullying, prejudice, or harassment. Through the curriculum, assemblies, circle time, and wider personal development opportunities, pupils are taught about respect, diversity, inclusion, and healthy relationships.

The school recognises that every child is unique and will work closely with pupils and their families to ensure that support is tailored to individual needs. Where mental health concerns, self-harm, suicidal ideation, bullying, or safeguarding concerns are identified, these will be addressed in line with the school's safeguarding and mental health procedures, with appropriate interventions, risk assessments, and referrals made where necessary.

Children who are questioning their gender

Schools will respond to children who are questioning their gender sensitively, professionally and on an individual basis. Staff should be professionally curious about the full range of the child's experiences and remain alert to potential safeguarding vulnerabilities, including complex mental health and psychosocial needs, family or peer relationships and discriminatory bullying.

Schools will not initiate action in relation to social transition. Where a child or parent/carer requests support relating to social transition, the school will consider the request in accordance with KCSIE 2026, its safeguarding duties and applicable equality and human rights obligations. Decisions will be based on the best interests of the child and the impact on other children and will be appropriately documented.

Where a child requests support with social transition, parents/carers should be involved as a matter of priority and their views given significant weight, unless involving them would place the child at greater risk of harm. The school should consider any available clinical advice and, where relevant, seek additional professional advice, including from the SENCO and DSL.

Where a child has shared their feelings about their gender but has not asked the school to make changes to how they are treated, staff should respond in accordance with normal safeguarding procedures. Confidentiality should only be breached where there is a safeguarding or other lawful reason to do so.

Any decision should take account of the child's age and developmental stage, available clinical advice, the child's wider circumstances and safeguarding needs. Schools should maintain flexibility and avoid creating unnecessary pressure on children to make decisions about their gender.

Any request for support with social transition must be considered through the school's established safeguarding and decision-making processes. The school's decision-making process and rationale must be recorded, and the DSL must be involved where there are safeguarding concerns or where the circumstances require safeguarding advice.

Child-on-child abuse (including harmful sexual behaviours, sexual violence and sexual harassment)

All staff should recognise that children can abuse other children and that child-on-child abuse can occur inside or outside school, online or offline, and between children of any age, gender or background. Staff should be able to recognise abuse, understand their role in preventing it and know how to respond to concerns.

Child-on-child abuse may include bullying, abuse in intimate personal relationships, physical abuse, serious violence, sexual violence, sexual harassment, causing someone to engage in sexual activity without consent, making or sharing nudes and semi-nudes, upskirting, and initiation or hazing-type violence. It may also involve online or technology-enabled abuse, including AI-generated or digitally manipulated imagery.

The absence of reported incidents does not mean that child-on-child abuse is not occurring. We will maintain an attitude of "it could happen here" and will not dismiss harmful behaviour as "banter", "just having a laugh" or "part of growing up". All reports will be taken seriously and responded to appropriately.

Child-on-child abuse can occur face-to-face, online or across both contexts. While some forms of abuse may disproportionately affect girls, all children can be victims or display harmful behaviour, and all concerns will be taken seriously.

Not all behaviour between students will constitute child-on-child abuse or require a safeguarding response. Schools should consider the nature, severity, context, frequency and impact of the behaviour, including any imbalance of power or vulnerability. Where behaviour raises safeguarding concerns, this policy will apply alongside the school's Behaviour and Ethos Policy. This might include where the alleged behaviour:

- Is serious e.g. potentially a criminal offence
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Responding to child-on-child abuse:

Where a concern or allegation of child-on-child abuse is reported, the welfare and safety of all children involved will remain central to decision-making. The school will:

- take the concern seriously and record it on CPOMS;
- protect the child who may have been harmed and consider the needs and safeguarding of any child who may have caused harm;
- assess and manage ongoing risk, including the risk of further contact or harm;
- consider whether advice, referral or involvement from Children's Social Care and/or the police is required;
- provide appropriate support to all children affected, including witnesses; and

- take proportionate action to enable all children involved to access education safely.
- Staff must report concerns to the DSL/DDSL and must not investigate the allegation themselves.

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

The DSL will put a risk assessment and support plan into place for all children involved – the victim(s), the child(ren) against whom the allegation has been made and any other children affected by child-on-child abuse – with a named person they can talk to if needed, aware there may be physical and mental health implications requiring further support as well as signposting for additional support. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).

Where police or Children's Social Care are involved, the school will work with those agencies to avoid prejudicing their enquiries while continuing to meet its safeguarding responsibilities. The fact that another agency is investigating an incident does not prevent the school from taking appropriate disciplinary or safeguarding action, provided this does not prejudice the investigation. The DSL will liaise with the relevant agency where there is uncertainty about the appropriate course of action.

Where a student does not want information shared

Where a child does not want information shared

Where a child asks the school not to share information about sexual violence or sexual harassment, the DSL will listen to and consider the child's wishes alongside the school's safeguarding duties and the safety of the child and others. Information may need to be shared where there is a safeguarding concern, a legal obligation or another lawful basis for sharing information.

Where a child is at risk of harm, in immediate danger or has been harmed, the school will make an appropriate referral to Children's Social Care and/or the police. Parents/carers should normally be informed unless doing so would increase the risk of harm to the child or otherwise prejudice safeguarding or criminal investigations.

Where a report concerns rape, assault by penetration or sexual assault, the school will consider police involvement in accordance with safeguarding procedures.

The school will take reasonable steps to protect the privacy and anonymity of children involved in reports of sexual violence or sexual harassment. Information will be shared only with those who need it for safeguarding or other legitimate purposes, and the potential impact of social media on confidentiality and the spread of rumours will be considered.

Preventing child-on-child abuse

We will take proactive steps to prevent child-on-child abuse and create an environment where children feel confident reporting concerns. This will include:

- challenging derogatory, discriminatory, misogynistic, sexualised or otherwise harmful language and behaviour;
- ensuring the curriculum teaches respectful relationships, consent, appropriate behaviour and how to seek help;
- providing accessible ways for children to report concerns and ensuring reports are taken seriously;
- training staff to recognise signs of child-on-child abuse, including where a child may not make a direct disclosure;

- considering the additional barriers that may affect children with SEND or other vulnerabilities;
- recognising that a child displaying harmful behaviour may themselves be experiencing abuse or other safeguarding concerns;
- considering the impact of online activity and social media when responding to incidents; and
- reviewing incidents for wider environmental, systemic or contextual safeguarding issues.

Informing parents/carers

Where appropriate, we will discuss safeguarding concerns with the child's parents or carers. The DSL will normally lead on this, and other staff should only discuss safeguarding concerns with parents/carers following consultation with the DSL.

Following a report of sexual violence, the school will normally engage with the parents/carers of both the child who has been harmed and the alleged perpetrator. In cases of sexual harassment, informing parents/carers will be considered on a case-by-case basis and may not always be necessary or proportionate.

Parents/carers should not be informed where doing so would place a child or another person at increased risk of harm, prejudice a police investigation or otherwise be contrary to the child's welfare. In such circumstances, the DSL will work with Children's Social Care and/or the police as appropriate to determine what information can be shared and when.

The school will carefully consider what information is provided to the respective parents/carers about the other child involved and when it is shared.

Where appropriate, the DSL will meet with the child who has been harmed and their parents/carers to discuss the safeguarding arrangements being put in place, understand the child's wishes and identify any support required. The DSL may also meet with the alleged perpetrator and their parents/carers to discuss support, safeguarding arrangements and any decisions affecting the child's education or supervision.

The DSL will normally attend such meetings, with the involvement of other agencies considered on a case-by-case basis.

External agencies

Where appropriate, children and their parents/carers will be informed of their right to contact Children's Social Care or the police directly and will be provided with relevant contact details.

The school will work openly and cooperatively with Children's Social Care, the police, health services, the local safeguarding partnership and other relevant agencies. Where another agency is involved, the school will share relevant information lawfully and promptly and will contribute to assessments, meetings and safeguarding plans as required.

Safeguarding Separation

In rare circumstances, it may be necessary to temporarily forbid a student from attending the school premises for safeguarding purposes, for example where an allegation of harm by one student against another means that physically separating the students is necessary.

Safeguarding separation is not a suspension or permanent exclusion on disciplinary grounds.

Safeguarding separation must only be used where separating students is essential and cannot practicably be achieved in a way that allows one or more of the students to remain on the school

premises. It must not be used as an informal exclusion or as a means of avoiding the statutory requirements that apply to suspension or permanent exclusion.

Any decision to temporarily forbid a student from attending the school premises must be made on a case-by-case basis, with the DSL or a DDSL taking a lead role and using their professional judgement. The school should seek support from other agencies, including Children's Social Care and/or the police, where required.

Before making the decision, the school must consider:

- the immediate safeguarding risk and the needs of all students involved;
- whether the students can be safely separated while remaining on the school premises;
- the best interests of the child;
- the school's duties under the Human Rights Act 1998, Equality Act 2010 and Keeping Children Safe in Education;
- any relevant individual risk assessment, support plan or SEND or medical considerations; and
- whether the proposed arrangements are reasonable, rational and procedurally fair.

Where a student is temporarily forbidden from attending the school premises, the school must:

- inform the student's parents/carers of the reason why the student has been temporarily forbidden from attending, in conjunction with the DSL or DDSL, unless there is a specific safeguarding reason why this should not happen;
- notify the Trust Board, in accordance with the Trust's governance arrangements;
- ensure that appropriate education is provided during the period the student is unable to attend the school premises. Where the school or the student's parent/carer does not arrange this, the local authority must arrange education in accordance with its statutory duty;
- maintain appropriate safeguarding support and oversight for the student;
- keep the arrangement under regular review and end it as soon as it is safe and appropriate to do so; and
- record the decision, the safeguarding rationale, the arrangements made, the agencies consulted and the review arrangements.

Where safeguarding separation follows a report of sexual violence, the DSL or DDSL must undertake an immediate risk and needs assessment. Following a report of sexual harassment, the need for a risk assessment must be considered on a case-by-case basis.

The school must continue to follow the safeguarding procedures set out in this policy in relation to all students involved, including consideration of the needs of the student who may have experienced harm and the student whose behaviour or alleged conduct has resulted in the safeguarding concern.

Safeguarding separation must not be used to circumvent the statutory framework for suspension or permanent exclusion. Where a student's removal from school is for disciplinary reasons, the school must follow the Trust Exclusions Policy and the statutory guidance on suspension and permanent exclusion.

Contextual safeguarding

Safeguarding risks may arise outside the home and family environment, including through peer groups, schools, neighbourhoods, transport, online activity and the wider community. Staff, particularly the DSL and deputies, should consider the wider context in which concerns arise and whether extra-familial factors are contributing to a child's risk of harm.

Schools will use safeguarding data, local intelligence and information from safeguarding partners to identify contextual risks and consider appropriate preventative action. Where a referral is made to Children's Social Care, the school will provide relevant information about the child's wider circumstances and any known extra-familial risks.

The school is aware of the contextual safeguarding issues affecting children and young people within Lincolnshire and the local community. Staff receive regular safeguarding updates and training to ensure they remain vigilant to both emerging and ongoing risks.

Key safeguarding concerns identified locally include:

- Child Criminal Exploitation (CCE), including county lines activity and the grooming of children by criminal groups.
- Child Sexual Exploitation (CSE).
- Domestic abuse and the impact this can have on children and families.
- Mental health and emotional wellbeing concerns, including self-harm and suicidal ideation.
- Online safety risks, including cyberbullying, inappropriate online content, online grooming, and the misuse of social media and gaming platforms.
- Peer-on-peer abuse, including sexual harassment and harmful sexual behaviour.
- Neglect, which remains one of the most common safeguarding concerns for children.
- Attendance concerns and persistent absence, recognising that these can be indicators of wider safeguarding issues.
- Radicalisation and extremism, including vulnerability to extremist influences both online and offline.
- Substance misuse within families and by young people.
- Risks associated with domestic abuse, violence against women and girls, and unhealthy relationships.
- The safeguarding needs of vulnerable groups including pupils with SEND, children in care, previously looked after children, young carers, and LGBTQ+ pupils.

The school will continue to monitor local safeguarding trends through guidance provided by the Lincolnshire Safeguarding Children Partnership (LSCP), Lincolnshire County Council, the Mental Health Support Team (MHST), and other safeguarding partners. Safeguarding information and emerging local risks are shared regularly with staff through training, briefings, and safeguarding updates to ensure that all children receive timely and appropriate support.

Children's social care assessments should consider such factors, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Further information can be found in Appendix 2 below; KCSIE September 2026, Working Together to Safeguard Children (2026) and www.contextualsafeguarding.org.uk

Domestic abuse and Operation Encompass

Children are recognised as victims of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse. Domestic abuse can have significant and lasting effects on a child's safety, emotional wellbeing, behaviour, attendance and learning.

Operation Encompass is a police and education information-sharing scheme designed to enable schools to provide timely support to children affected by domestic abuse. Police forces have a statutory duty to notify relevant educational settings where they have reasonable grounds to believe that a child may be a victim of domestic abuse.

Notifications should be shared with the school's trained Key Adult, normally the DSL or a Deputy DSL, before the start of the next school day wherever possible. The information will be treated as sensitive and confidential and shared only with those who have a legitimate safeguarding need to know.

Receipt of an Operation Encompass notification does not, in itself, replace a safeguarding referral or require the school to speak to the child or contact parents/carers. The DSL will consider the child's circumstances, wishes, presentation, existing safeguarding information and any advice from the police or Children's Social Care when deciding the appropriate response.

The DSL will consider whether the child requires additional support or safeguarding action and whether information should be shared with Children's Social Care or another agency. An Operation Encompass notification does not replace the school's responsibility to make a safeguarding referral where there are concerns about a child's welfare or risk of significant harm.

All staff should remain alert to indicators that a child may be affected by domestic abuse and report concerns to the DSL in accordance with this policy.

Schools should ensure that the DSL, Deputy DSLs and any other designated Key Adults understand the school's Operation Encompass arrangements and receive appropriate training.

Restrictive interventions, including the use of reasonable force

School staff may use reasonable force where it is lawful, necessary and proportionate to prevent harm or maintain safety. Any use of force must be consistent with current legislation, the Department for Education's guidance on restrictive interventions, the Trust's Positive Handling Policy and any relevant individual risk assessment or support plan.

Reasonable force may be used to prevent a child from:

- hurting themselves or others;
- damaging property; or
- causing serious disruption or disorder.

The decision to use force is a matter of professional judgement and must take account of the individual circumstances, including the child's age, understanding, SEND, disability, medical needs, known trauma or adverse childhood experiences and the immediacy of any risk.

Wherever reasonably practicable, staff should consider whether de-escalation strategies or a less restrictive intervention could safely manage the situation. Reasonable force means using no more force than is necessary and for no longer than is necessary in the circumstances.

Any use of reasonable force must:

- be reported promptly to the Headteacher or delegated senior leader;

- be recorded in accordance with the Trust's Positive Handling procedures;
- be reviewed where safeguarding concerns arise; and
- where the incident is significant, be reported to the child's parents/carers in accordance with statutory guidance and Trust procedures, unless doing so would place a child or another person at increased risk.

Schools must ensure that significant incidents involving the use of force are recorded and reported to parents/carers in accordance with statutory requirements and Trust procedures.

Restrictive interventions should be used only where necessary, lawful and proportionate to the circumstances and should be kept to the minimum necessary. Schools must follow the Trust's Positive Handling Policy and the Department for Education's guidance on restrictive interventions, including requirements relating to recording, reporting, review and the use of seclusion and restraint.

Where restraint or restrictive intervention is used repeatedly with the same child, the school should consider whether wider safeguarding, SEND, behavioural, health or mental health assessment or review is required.

Further detail is provided in the Trust's Appropriate Touch & Restrictive Intervention and Behaviour & Ethos policies.

Making or sharing nudes and semi-nudes, including AI-generated imagery

This section applies to incidents involving the making, sending or posting of nudes and semi-nudes by children under 18, whether consensual or non-consensual. Images may be taken by the child, taken or created by another person, digitally altered or wholly generated using artificial intelligence, including what may be described as deepfakes or deep nudes.

Such incidents require a safeguarding response and should be managed in accordance with the Department for Education and UK Council for Internet Safety (UKCIS) guidance.

Nudes and semi-nudes may include:

- photographs;
- videos;
- live streams;
- digitally manipulated images;
- AI-generated images ("deepfakes");
- AI-generated sexually explicit videos;
- composite or edited images designed to appear authentic.

Staff must not:

- intentionally view, copy, print, download, save, forward, share or otherwise retain the imagery;
- ask a child to send, show or download the imagery;
- delete the imagery or ask the child to delete it;
- investigate or question children about the content of the imagery;
- share details of the incident with other staff, children or parents/carers unless directed to do so by the DSL; or

- blame, shame or otherwise express judgement towards any child involved.

If imagery is seen accidentally, this must be reported to the DSL immediately. The DSL will determine whether any viewing of the imagery is necessary and lawful and will ensure that any decision and rationale are recorded.

Staff should respond calmly, reassure the child that the concern will be taken seriously and explain that appropriate safeguarding action will be taken.

Initial review meeting

The DSL will undertake an initial safeguarding assessment and consider:

- whether any child is at immediate risk of harm;
- coercion, grooming, exploitation, blackmail or pressure;
- age, developmental stage, SEND and capacity to understand or consent;
- power imbalance or an adult's involvement;
- the risk of further sharing or exploitation;
- wider safeguarding concerns, including criminal or sexual exploitation;
- the impact on the child's mental health and wellbeing; and
- whether AI or other digital manipulation has been used.

The DSL will determine whether the matter requires referral to the police and/or Children's Social Care and whether any further information is required to assess risk. In most circumstances, the imagery itself should not be viewed.

Mandatory referral circumstances

An immediate referral to the police and/or Children's Social Care will be made where:

- an adult is involved, including where an adult may be posing as a child;
- there are concerns about coercion, blackmail, grooming, exploitation or a significant power imbalance;
- there are concerns about a child's capacity to understand or consent, including where SEND or other vulnerabilities may affect this;
- the content depicts violent, abusive or developmentally inappropriate sexual activity;
- a child under the age of 13 is depicted in a sexual act; or
- a child is at immediate risk of harm, including where there are concerns about suicide or self-harm.

Where these circumstances do not apply, the DSL will determine whether the incident can appropriately be managed within school, taking account of the full circumstances and any wider safeguarding concerns. The decision and rationale must be recorded.

Further review by the DSL

Where an external referral is not made initially, the DSL will continue to assess the circumstances and any ongoing risk. This may include speaking with the children involved where appropriate and proportionate.

If information subsequently indicates that a child has been harmed or is at risk of harm, the DSL will make an immediate referral to Children's Social Care and/or the police.

Informing parents and carers

Parents/carers will normally be informed at an early stage, unless doing so would place a child or another person at increased risk of harm, prejudice a police investigation or otherwise be contrary to the child's welfare. The DSL will make this decision and record the rationale.

Police involvement

Where police involvement is required, the DSL will follow the school's local safeguarding and police referral arrangements.

Recording and monitoring

All incidents involving nudes and semi-nudes, together with the safeguarding assessment, decisions, referrals and actions taken, must be recorded on CPOMS in accordance with the Trust's safeguarding recording procedures.

Curriculum and education

Schools will provide age-appropriate education about the risks associated with creating, receiving and sharing intimate images and videos. This will include understanding consent, pressure and coercion, online sexual harassment, the legal and emotional consequences of image sharing, and how to seek help.

Education will be delivered in a safeguarding-first, child-centred and non-judgemental way. Children involved in incidents will receive appropriate safeguarding support regardless of whether the circumstances are considered consensual or non-consensual.

Concerns and allegations about adults working with children

Safeguarding concerns about a staff member, supply teacher, volunteer or contractor

We recognise that adults working in or on behalf of the school, including staff, supply teachers, trainee teachers, volunteers and contractors, may pose a safeguarding risk to children.

Any member of staff who has a safeguarding concern or allegation about an adult working with children must report the concern without delay and complete the Staff Concerns Form, available on SharePoint. The form should provide a factual account of the concern and any immediate action taken.

Where there is an immediate risk of harm to a child, staff must report the concern directly to the Headteacher or appropriate senior leader immediately and must not delay doing so while completing the Staff Concerns Form.

Where the concern relates to the Headteacher, it must be reported to the relevant Director of Education or Executive Director of Education, who will ensure that the appropriate case management arrangements are followed. Concerns relating to the Head of Safeguarding should be reported to the Executive Director of Education.

The relevant case manager will follow the Trust Allegations Against Staff Policy and liaise with the Local Authority Designated Officer (LADO), Children's Social Care, the police and other agencies as required.

Staff must not investigate allegations themselves or seek to determine whether an allegation is substantiated. Concerns must not be dismissed because an individual is well regarded, experienced, senior or has an unblemished employment history, nor should concerns be prejudged before appropriate enquiries have been undertaken.

If a staff member feels unable to raise a safeguarding concern through the school's normal arrangements, they should use the Trust Whistleblowing Policy and may seek advice from the LADO or appropriate external safeguarding agencies, including the NSPCC Whistleblowing Advice Line.

Where concerns or allegations relate to an adult or organisation providing activities for children on school premises, the same safeguarding and allegations procedures must be followed, including referral to the LADO where appropriate.

For Early Years

Where the school has registered early years provision, the school will make any required notification to Ofsted in accordance with the Early Years Foundation Stage statutory framework, including the requirement to notify Ofsted of relevant allegations of serious harm or abuse and the action taken, within the required timescale. (see Trust Allegations Against Staff Policy for more detail).

Managing safeguarding concerns and allegations about staff

The Trust Allegations Against Staff Policy applies where a concern or allegation may meet the harm threshold. This includes where an adult working in or on behalf of the school has:

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

- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour outside the school or workplace.

Where there is uncertainty about whether the harm threshold is met, the school should seek advice from the LADO in accordance with local procedures.

Where a concern does not meet the harm threshold, it must be considered and managed as a low-level concern in accordance with the Allegations Against Staff Policy.

Information about concerns and allegations must be handled confidentially and shared only with those who need the information for safeguarding, investigation or another legitimate purpose. Parents/carers should be informed about allegations concerning their child in accordance with the advice of the LADO and, where involved, Children's Social Care or the police.

Further procedural detail is set out in the Trust Allegations Against Staff Policy.

Ceasing to use staff

Where the Trust ceases to use the services of an adult because they are considered unsuitable to work with children, the Trust will consider whether the statutory criteria for referral to the Disclosure and Barring Service (DBS) are met.

Where a teacher is dismissed, or the Trust ceases to use their services because of serious misconduct, or would have done so had they not left, the Trust will consider whether a referral to the Teaching Regulation Agency (TRA) is required.

A settlement or compromise agreement must not prevent the Trust from fulfilling any safeguarding, disciplinary, DBS or TRA duties.

Where an individual leaves, resigns or ceases to provide their services, safeguarding enquiries and any appropriate investigation will continue to conclusion wherever possible.

Resignation

The resignation, retirement or departure of an adult does not prevent the school from continuing safeguarding enquiries or investigations into an allegation. Wherever possible, the school will reach and record an outcome, even where the individual no longer works for the Trust.

Any appropriate DBS or TRA referral duties will continue to apply.

Criminal proceedings

Following a criminal investigation or prosecution, the school will liaise with the LADO regarding any further safeguarding or disciplinary action required, taking account of the outcome of the criminal process and the different standards of proof that apply.

Record keeping and retention of documentation

Records relating to safeguarding concerns and allegations about adults must be maintained securely, confidentially and in accordance with statutory guidance, data protection requirements and the Trust's Record Retention Schedule.

Records should clearly identify the concern or allegation, actions taken, advice received, decisions made, the rationale for those decisions, the outcome and any learning identified.

Allegations found to be malicious or false should be removed from personnel records. Records of allegations that are substantiated, unfounded or unsubstantiated must be retained securely in accordance with Keeping Children Safe in Education and the Trust's record retention requirements. Such records should not be retained in personnel records unless there is a legitimate and lawful reason to do so.

False, unfounded, unsubstantiated or malicious allegations must not be included in references. Where a safeguarding allegation has been substantiated and meets the harm threshold, the Trust will consider whether relevant factual information should be included in a reference.

Allegation outcomes

Where an allegation is determined to be false, unfounded, unsubstantiated or malicious, the school should consider whether the child or person making the allegation may be in need of help or may themselves have experienced abuse.

Where an allegation is deliberately invented or malicious, the Headteacher will consider whether disciplinary action is appropriate in accordance with the school's Behaviour and Ethos Policy.

An unsubstantiated allegation must not be treated as a finding that the allegation was malicious or deliberately false.

Low-level concerns about staff behaviour

A low-level concern is any concern, no matter how small, or even where there is no more than 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 but does not meet the harm threshold or is not otherwise serious enough to require referral to the LADO.

Examples may include:

- being over-friendly with children;
- having favourites;
- taking photographs of children on a personal mobile phone contrary to school expectations;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating or unnecessarily embarrassing students.

Low-level concerns should be reported using the Staff Concerns Form, available via the school's 'Launch Pad', unless the circumstances require the harm-threshold allegations process above.

The person raising the concern should provide sufficient information to enable the concern to be considered, including the nature of the concern, the context in which it arose, the date and any action already taken. Where the person wishes to remain anonymous, this should be respected as far as reasonably possible.

The Headteacher is the ultimate decision-maker in respect of low-level concerns and may consult the DSL, Head of Safeguarding, Head of HR or LADO as appropriate.

Low-level concerns must be handled confidentially and records held securely in accordance with data protection requirements. The Headteacher should review low-level concerns periodically to identify patterns of behaviour, training needs or wider cultural issues.

Where a pattern of behaviour indicates that the harm threshold may have been met, the matter must be referred to the LADO and managed under the Allegations Against Staff Policy.

Concerns relating to supply staff and contractors should also be shared with their employer so that potential patterns of inappropriate behaviour can be identified.

The school will promote a culture in which staff feel confident to raise concerns, challenge inappropriate behaviour and self-refer where they recognise that their own behaviour may have fallen below expected professional standards.

Whistleblowing

Whistleblowing is the disclosure of information that relates to a genuine concern of suspected wrongdoing or dangers at work.

Whistleblowing covers concerns made that report wrongdoing that is “in the public interest”. Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Students’ or staff health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Damage to the environment
- An abuse of power or authority
- Attempts to cover up the above, or any other wrongdoing in the public interest

A whistleblower is a person who raises a genuine concern relating to the above. Not all concerns about the trust, or individual schools in the trust, count as whistleblowing. For example, personal staff grievances such as bullying, or harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance. Such complaints should be raised using the Grievance or Dignity at Work policies.

Such unacceptable acts or omissions may have been carried out by employees, caused by faults in procedures or may be oversights that need to be rectified. The act or omission may have finished, be in process or not yet started.

Anthem recognises that the reporting a concern can be a difficult decision to take, not least because of the fear of reprisal. Anthem aims to encourage openness and will support employees who raise genuine concerns in good faith under the Whistleblowing Policy, even if the concern turns out to be unfounded.

Staff should understand that where they believe safeguarding concerns have not been addressed appropriately, they may use the Trust's Whistleblowing Policy or contact external agencies, including the NSPCC Whistleblowing Advice Line, in accordance with statutory guidance.

Employees are encouraged to report their concerns by emailing the dedicated whistleblowing mailbox: whistleblowing@anthemtrust.uk

More information about whistleblowing can be found in the Whistleblowing Policy and at https://www.gov.uk/whistleblowing

Safer recruitment and safer working practice

Safer recruitment

Anthem Schools Trust recognises that safer recruitment is an essential part of safeguarding and applies throughout the recruitment and employment lifecycle. The Trust will ensure that appropriate recruitment, vetting and due-diligence processes are followed for all adults working in or on behalf of our schools.

Recruitment and vetting checks will be undertaken in accordance with Keeping Children Safe in Education 2026, relevant legislation and the Trust Safer Recruitment Policy.

Recruitment checks will be appropriate to the role and will include, where applicable:

- verification of identity and right to work in the UK;
- verification of qualifications and professional status where relevant;
- appropriate references, obtained and scrutinised in accordance with the Trust Safer Recruitment Policy;
- the appropriate DBS check and, where required, a children's barred list check;
- checks relating to prohibition from teaching and prohibition from management where applicable;
- appropriate checks for individuals who have lived or worked outside the UK;
- online searches of shortlisted candidates as part of due diligence; and
- any additional checks required by legislation or the nature of the role, including childcare disqualification checks where applicable.

The school will assess all information obtained through recruitment and vetting checks before making an appointment.

The school will undertake online searches on shortlisted candidates as part of its safer recruitment due diligence. Candidates will be informed that these searches will be undertaken. Information identified through an online search will only be considered where it is relevant to the individual's suitability to work with children and will be handled appropriately.

Information obtained through online searches will be considered only where relevant to the individual's suitability to work with children.

These checks will be made in accordance with the Safer Recruitment Policy. They will be made in accordance with the role applied for.

Where an applicant has lived or worked outside the UK, the school will undertake appropriate additional overseas checks in accordance with KCSIE 2026 and the Safer Recruitment Policy. The nature of these checks will depend on the applicant's circumstances and the information available from the relevant country or professional regulator.

The school will maintain a Single Central Record (SCR) in accordance with KCSIE 2026, recording the required recruitment and vetting checks for relevant staff and other individuals. Supporting documentation will be retained securely in accordance with the Trust's recruitment and record-retention arrangements.

The SCR will be reviewed regularly to identify and address any gaps or outstanding checks.

Detailed recruitment and vetting procedures are set out in the Trust Safer Recruitment Policy.

Training

All staff

All staff will receive safeguarding and child protection training at induction and regular updates thereafter, at least annually. Training will include online safety, including staff responsibilities for filtering and monitoring, and will be informed by national guidance, local safeguarding arrangements and the school's contextual safeguarding risks.

All staff must read Part One of KCSIE 2026, the Child Protection and Safeguarding Policy, the Staff Code of Conduct, the Behaviour Policy, relevant online safety arrangements and information about the DSL and deputy DSLs.

Safeguarding training will develop professional judgement as well as statutory knowledge, including professional curiosity, recognition of cumulative concerns, appropriate information sharing, accurate recording and confident safeguarding decision-making.

Safeguarding induction

New staff, volunteers, agency and supply staff, regular contractors and other adults working in school will receive an appropriate safeguarding induction before working unsupervised with children wherever reasonably practicable.

Induction will include:

- Part One of KCSIE 2026;
- the Child Protection and Safeguarding Policy;
- the Staff Code of Conduct;
- the Behaviour Policy;
- online safety and filtering and monitoring arrangements;
- safeguarding recording and reporting procedures; and
- whistleblowing arrangements.

The DSL will plan the school's safeguarding training cycle according to its contextual needs and the Trust's safeguarding training framework. Training will cover relevant statutory and local safeguarding developments and may include Family Help, professional curiosity, cumulative concerns, contextual safeguarding, AI-enabled safeguarding risks, self-generated intimate imagery, filtering and monitoring, information sharing and recording quality.

Staff will receive safeguarding and child protection updates as required, and at least annually, through appropriate channels including briefings, meetings, e-bulletins or other Trust communications.

All staff and volunteers will sign a declaration at the beginning of each academic year to say that they have reviewed the required safeguarding information and guidance.

All Trust staff, Trustees, Academy Community Council members and relevant central colleagues will receive safeguarding training appropriate to their roles and responsibilities.

Safeguarding team members will have access to regular Trust safeguarding networks, updates and opportunities for shared learning and professional challenge.

The DSL and DDSLs

The DSL and deputy DSLs will undertake appropriate safeguarding and child protection training at least every two years and will update their knowledge and skills regularly, including through annual updates and engagement with relevant national and local safeguarding developments.

The DSL and deputy DSLs will receive safeguarding induction appropriate to their role and will access Trust safeguarding networks, CPOMS and record-keeping training, safeguarding supervision and other relevant professional development.

The DSL should have opportunities for regular reflective practice and supervision and to learn from local and national safeguarding reviews.

Trustees and ACC members

Trustees and Academy Community Council members will receive safeguarding and child protection training at induction and regular updates appropriate to their roles. Training will enable them to understand their safeguarding responsibilities, provide effective strategic challenge and assure themselves that safeguarding arrangements are effective.

The Chair of the relevant Academy Community Council will receive appropriate training where they may be required to act as case manager for an allegation concerning the Headteacher.

Safeguarding training should include statutory responsibilities, safeguarding assurance, safeguarding data, professional challenge, safeguarding culture and learning from safeguarding incidents and reviews.

Staff who have contact with students and families

Where appropriate to their role, staff who work directly with children and families will receive supervision or other appropriate opportunities for support, reflection, coaching and professional development, including confidential discussion of safeguarding concerns.

Early Career Teachers (ECTs) & Trainees

Early Career Teachers, trainee teachers and student placements will receive appropriate safeguarding induction and ongoing support. Mentors and senior leaders should ensure that safeguarding responsibilities and professional boundaries are understood and embedded from the outset.

Clinical supervision

Anthem Schools Trust provides access to external clinical supervision for safeguarding teams to support reflective practice, professional decision-making and staff wellbeing.

Case management supervision is also provided through Trust safeguarding arrangements, including Deep Dive and Deep Dive Light visits and the Significant Safeguarding Incident (SSI) process.

Clinical and safeguarding supervision complements, but does not replace, statutory safeguarding responsibilities or line management.

Learning from Safeguarding Practice

Schools will use safeguarding audits, significant safeguarding incidents, local and national safeguarding reviews, complaints, inspection findings, quality assurance activity and multi-agency learning to identify improvements. Learning should inform safeguarding practice, staff training, policies, systems and school improvement planning.

Online and digital safety

Online safety is a safeguarding issue and must be considered alongside offline safeguarding. Children may experience abuse, exploitation and other harms online, and online and offline risks may overlap.

Online safeguarding risks include, but are not limited to, child sexual abuse, online grooming, child criminal and sexual exploitation, coercion and control, cyberbullying, radicalisation and extremism, harmful or misleading content, AI-enabled abuse, deepfake imagery, financial exploitation, fraud and harmful online challenges.

We recognise that technology is a significant component of many safeguarding and wellbeing issues and can provide the platform for harmful and inappropriate online material. We endeavour to do everything possible to address this including:

- Having robust processes, including filtering and monitoring systems, in place to ensure the online safety of students, staff, volunteers and ACC members.
- Protecting and educating the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Setting clear guidelines for the use of mobile phones for the whole school community.
- Establishing clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Schools will consider the four areas of online risk identified in KCSIE 2026:

- Content – being exposed to illegal, inappropriate or harmful material.
- Contact – harmful interaction with other users, including grooming, exploitation, coercion and abuse.
- Conduct – behaviour online that increases the likelihood of or causes harm, including bullying, harassment and the creation or sharing of intimate imagery.
- Commerce – risks such as gambling, scams, phishing and financial exploitation.

To promote online safety, schools will:

- provide age- and developmentally appropriate online safety education through the curriculum;
- ensure students know how to recognise, report and seek help about harmful online behaviour and content;
- provide staff with appropriate online safety training, including their roles and responsibilities in relation to filtering and monitoring;
- provide parents/carers with appropriate information about online safety and how to raise concerns;
- maintain clear arrangements for reporting, recording, responding to and escalating online safeguarding concerns;
- apply the Trust Mobile Phones & Smart Technology Policy and relevant school procedures;
- maintain appropriate filtering and monitoring arrangements; and
- review online safety arrangements at least annually and following significant changes in technology, safeguarding risk or school practice.

The DSL will have strategic oversight of the school's online filtering and monitoring systems. The DSL must understand how the system functions, including the categories of risk monitored, escalation routes, and review frequency. The Headteacher, Designated Safeguarding Lead and those responsible for filtering and monitoring should receive appropriate assurance that these systems remain effective and responsive to emerging safeguarding risks.

Filtering & Monitoring

The Trust recognises that effective filtering and monitoring are important components of safeguarding children online. Schools must have appropriate filtering and monitoring systems in place to protect students from harmful or inappropriate online content and activity.

Filtering and monitoring arrangements must be proportionate to the school's context, reflect the age and needs of students, and take account of the school's identified safeguarding risks. They must support, but never replace, effective staff supervision, professional curiosity and appropriate safeguarding practice.

The Headteacher, DSL, the Head of Safeguarding and those responsible for IT and filtering and monitoring must have appropriate oversight of the effectiveness of these systems. The DSL must understand how the school's filtering and monitoring systems operate, including the categories of risk monitored, alert and escalation routes and how concerns are reviewed.

Schools must ensure that filtering and monitoring systems are regularly tested and reviewed, including at least annually and whenever there are significant changes to technology, devices, working practices or safeguarding risks. Reviews, checks and identified actions must be recorded.

Safeguarding concerns identified through filtering or monitoring must be reviewed promptly and managed in accordance with the school's safeguarding procedures.

Schools must ensure that staff understand their responsibilities in relation to filtering and monitoring, including how to report concerns where filtering or monitoring may not be operating effectively.

Further operational requirements are set out in the Trust Online Safety Policy and the school's filtering and monitoring procedures.

Cyber Security

Schools must maintain appropriate cyber security arrangements to protect students, staff, safeguarding information and Trust systems from cyber threats, unauthorised access and data loss. Cyber security is a shared safeguarding responsibility and must be considered alongside filtering, monitoring, information security and data protection.

Schools must follow Trust IT and cyber security requirements and report and respond to cyber security incidents in accordance with Trust procedures.

Artificial Intelligence

Artificial Intelligence (AI) provides significant opportunities for teaching, learning and wider school activity but also presents safeguarding risks that schools must recognise and manage.

Safeguarding risks associated with AI include, but are not limited to:

- AI-generated intimate images and videos, including deepfakes;
- impersonation and identity manipulation;

- grooming, coercion and exploitation;
- bullying, harassment and abuse;
- the creation or manipulation of harmful or misleading content;
- exposure to inappropriate or harmful material;
- misinformation and disinformation; and
- inappropriate or unsafe interactions with generative AI tools.

Schools must consider safeguarding, data protection and online safety risks before introducing or using new AI tools. AI tools must be used in accordance with Trust-approved arrangements and any relevant school policies and procedures.

Where AI is used to create, manipulate or distribute harmful content involving a child, including intimate imagery or deepfakes, the incident must be managed as a safeguarding concern in accordance with this policy.

Filtering and monitoring arrangements should take account of relevant AI-enabled risks and the ways in which students may access or use AI tools.

Schools should ensure staff understand safeguarding risks associated with AI, including:

- deepfake imagery;
- AI-generated intimate images;
- impersonation;
- manipulation;
- misinformation;
- automated grooming;
- exploitation through AI-enabled services;
- inappropriate use of generative AI by students.

AI must not replace professional judgement, statutory decision-making or the responsibilities of the Designated Safeguarding Lead.

Any AI system used in safeguarding must:

- operate within the Trust's approved governance arrangements;
- comply with data protection legislation;
- use only approved secure platforms;
- be subject to appropriate human oversight;
- never make autonomous safeguarding decisions.

Staff remain professionally accountable for all safeguarding decisions, referrals, assessments and records.

Artificial Intelligence Governance

The Trust may use approved Artificial Intelligence tools to support safeguarding quality assurance, data analysis and administrative tasks where appropriate.

AI must support, and never replace, professional judgement, statutory safeguarding decision-making or the responsibilities of the Designated Safeguarding Lead.

Any AI system used by the Trust or a school for safeguarding purposes must:

- operate within approved Trust governance arrangements;
- comply with data protection and information security requirements;
- use only approved and appropriately secure platforms;
- where required, complete an appropriate data protection impact assessment or other data protection assessment before processing personal or special category data;
- be subject to appropriate human oversight;
- not make autonomous safeguarding decisions; and
- have its outputs reviewed by an appropriately trained member of staff before they are relied upon.

Staff remain professionally accountable for all safeguarding decisions, referrals, assessments, records and actions, regardless of whether AI has been used to support the process.

Where AI is used to support safeguarding quality assurance or analysis, staff must consider the limitations of AI-generated outputs, including the possibility of inaccurate, incomplete or misleading information.

Mobile Phones, Smart Technology & Recording Devices

Mobile phones, smart technology and other portable communication or recording devices can present safeguarding risks if used inappropriately. These include exposure to harmful content, online grooming and exploitation, child-on-child abuse, image-based abuse, the creation or sharing of nudes and semi-nudes, including digitally manipulated or AI-generated imagery, cyberbullying, coercion, and the unauthorised recording or sharing of images, audio or information.

All Anthem schools will operate in accordance with the Trust Mobile Phones & Smart Technology Policy. Schools must implement the Trust's expectations in a way that reflects their age range and context.

The Trust expectation is that schools operate as mobile-phone-free environments by default. Any exception must be authorised and managed in accordance with the Trust Mobile Phones & Smart Technology Policy and the school's arrangements, including any reasonable adjustments or adaptations required by law or necessary because of a student's individual circumstances.

Staff must use school-approved systems and devices when photographing, recording or communicating with students. Personal devices must not be used to photograph, film or record students, communicate with students through personal accounts or messaging applications, or process confidential school information, unless expressly authorised under Trust procedures. Confidential or personal school information must not be entered into unapproved generative AI tools.

Where a mobile phone or other device is believed to contain evidence of a safeguarding concern or criminal offence, staff must follow the Trust Mobile Phones & Smart Technology Policy and the relevant searching, screening and confiscation guidance. Searches must only be undertaken by authorised staff. Staff must not routinely view, copy, forward or retain potentially harmful or criminal material unless this is lawful, necessary and in accordance with statutory guidance.

Any safeguarding concern involving a mobile phone, smart technology or recording device must be recorded on CPOMS and managed in accordance with this policy. This includes concerns involving image-based abuse, nudes and semi-nudes, including digitally manipulated or AI-generated imagery, online exploitation, coercion, harassment or the unauthorised recording or sharing of images, audio or video.

Schools must ensure that students, staff and parents/carers understand the school's expectations regarding mobile phones and smart technology, including how safeguarding concerns can be reported.

The school has a separate Mobile Phone and Camera Policy which sets out the expectations for the use of mobile phones, cameras, tablets, and other devices capable of taking photographs, videos, or recordings.

All staff, volunteers, visitors, and students are expected to follow this policy at all times. Images and videos of pupils may only be taken using school-approved devices and for legitimate educational or school purposes. Personal mobile phones and devices must not be used to photograph or record pupils.

Photographs and recordings will only be taken where appropriate consent has been obtained and will be stored securely in accordance with data protection requirements. Images will only be shared or published in line with parental permissions and school procedures.

Any concerns regarding the misuse of mobile phones, cameras, images, recordings, or online sharing will be treated as a safeguarding matter and reported immediately to the Designated Safeguarding Lead (DSL). Further details can be found in the school's Mobile Phone and Camera Policy.

Managing safeguarding outside of school

Safeguarding responsibilities extend beyond the school site and school day. Schools must ensure that appropriate safeguarding arrangements are in place whenever students are educated, cared for or otherwise supervised away from school, including through Alternative Provision, work experience, educational visits and homestay arrangements.

Alternative Provision

Anthem Schools Trust recognises that students attending Alternative Provision (AP) may be particularly vulnerable to safeguarding risks. The commissioning school remains responsible for the student's safeguarding and welfare throughout the placement.

Before a placement begins, the school must:

- be satisfied that the placement is appropriate and meets the student's individual needs;
- obtain appropriate safeguarding and safer recruitment assurances from the provider;
- obtain written confirmation that appropriate safeguarding checks have been completed on individuals working at the provider and that the provider will notify the school of relevant staffing changes;
- ensure appropriate safeguarding, attendance, SEND, medical and risk information is shared;
- ensure that clear arrangements are in place for reporting safeguarding concerns and attendance;

- know where the student is being educated, including the address of any provider, subcontracted provision or satellite site; and
- complete the required checks and due diligence in accordance with the Trust Alternative Provision Policy.

The school must maintain effective oversight of each AP placement, including regular communication with the provider, monitoring attendance and welfare, and reviewing whether the placement remains safe and appropriate. Placements must be reviewed at least fortnightly, and more frequently where the student's individual circumstances or level of risk require enhanced oversight.

Where safeguarding concerns arise, the placement must be reviewed immediately and, where necessary, terminated unless or until the concerns have been satisfactorily addressed.

Where reintegration into mainstream education is intended, this should be planned from the beginning of the placement and reviewed regularly.

The detailed commissioning, safeguarding, quality assurance and review arrangements for Alternative Provision are set out in the Trust Alternative Provision Policy.

Adults who supervise students on work experience

Schools organising work experience must ensure that the placement provider has appropriate policies and procedures in place to protect students from harm.

Schools must consider whether the person providing teaching, training, instruction, care or supervision will do so frequently, for more than three days in a 30-day period, or overnight. Where this meets the definition of regulated activity, the relevant safeguarding and barred-list requirements must be followed.

Schools must not request an enhanced DBS check with children's barred list information from a work experience provider for an individual supervising students aged 16 or 17.

Where a student aged 16 or over undertakes work experience in a specified setting, such as a school or sixth-form college, and the placement provides the opportunity for contact with children, the provider should consider whether an enhanced DBS check is appropriate for the student. DBS checks cannot be requested for students under the age of 16.

Work experience providers must understand the school's safeguarding expectations, reporting arrangements and emergency contact arrangements.

Students staying with host families (homestay)

Where schools arrange for students to stay with host families, including as part of foreign exchange visits, sports tours or similar activities, the school must ensure that appropriate safeguarding arrangements are in place.

For homestays arranged by the school in the UK, the school must:

- assess the suitability of the host family and accommodation;
- obtain an enhanced DBS certificate with children's barred list information for adults who are engaging in regulated activity as part of the homestay;
- consider whether enhanced DBS checks are appropriate for other household members aged 16 or over;

- consider relevant safeguarding, cultural, medical, communication and emergency arrangements; and
- ensure that students know who to contact if they feel unsafe or uncomfortable or an emergency occurs.

For homestays arranged overseas, schools should liaise with the partner school or organisation to establish a shared understanding of the safeguarding arrangements. Parents/carers should be informed of the arrangements.

Where a homestay arrangement may amount to private fostering, the requirements below must be followed.

Private fostering

Private fostering may arise where a child under 16, or under 18 where the child has a disability, is cared for and accommodated for 28 days or more by someone who is not their parent, someone with parental responsibility or a relative.

Staff who become aware of a possible private fostering arrangement must inform the DSL.

Where the school becomes aware of a private fostering arrangement, the school must notify the local authority so that it can assess whether the arrangement is suitable and safe for the child. Where the school is directly involved in arranging the private fostering arrangement, it must notify the local authority as soon as possible after the arrangement has been made.

The DSL should ensure that the school is clear about who has parental responsibility for the child and that any relevant safeguarding concerns are appropriately considered.

Elective Home Education

Parents have a right to electively home educate their child. Schools should not seek to prevent a parent from making a lawful decision to home educate, but should remain professionally curious where the decision arises alongside safeguarding concerns, significant attendance concerns or other indicators of vulnerability.

Where a parent/carer intends to withdraw a student for Elective Home Education, the school should, where possible, work with the local authority and parents/carers to ensure that the implications of the decision have been properly considered. This is particularly important where the student has SEND, a social worker or other safeguarding vulnerabilities.

Where safeguarding concerns exist, these must be addressed through the school's normal safeguarding procedures and, where appropriate, referred to the local authority's children's social care.

Schools must follow the statutory requirements and Trust procedures relating to removal from the admission register and notification to the local authority.

Children Missing Education

Children who are absent from education for prolonged periods or on repeat occasions may be at increased risk of abuse, neglect, exploitation and other safeguarding harms. Attendance concerns must therefore be considered alongside the wider safeguarding picture.

The DSL must be informed of repeated, prolonged or otherwise concerning absence where there may be a safeguarding risk.

Schools must follow the Trust's attendance and children missing education procedures, including the Trust's **five-day protocol**, and make the required notifications and referrals to the local authority.

Where a student becomes a child missing education, the school must support the local authority in making reasonable enquiries and provide the information required to assist in identifying and safeguarding the child.

When a student moves to another school, safeguarding information must be transferred securely and promptly in accordance with statutory guidance and Trust procedures.

Further details of this can be found in our Attendance policy and within our Missing Pupils policy.

Site and operational safeguarding

School premises and visitors

Schools must take appropriate and proportionate steps to ensure that their premises are safe and secure and that safeguarding risks associated with the school site are identified and managed. Site safeguarding arrangements should consider access control, visitor management, emergency arrangements, lone working, site maintenance and other relevant safeguarding risks.

Visitors must follow the school's visitor management arrangements, including signing in and out and wearing an appropriate visitor identification badge. Visitors must not be permitted to move around the school site without appropriate authorisation. The Headteacher or appropriate senior leader will use professional judgement to determine whether a visitor needs to be escorted or supervised.

Visitors attending in a professional capacity should have their identity checked and the school should be assured that appropriate safeguarding checks have been completed by their employer where relevant. The school should not routinely request DBS certificates from visitors who are attending the school for a meeting, event or other legitimate purpose where they are not undertaking regulated activity.

Visitors who do not comply with the school's safeguarding or site-security arrangements should be challenged and, where necessary, asked to leave the premises.

Agency and supply staff must have their identity verified on arrival and the school must ensure that the individual presenting for work is the person supplied and appropriately vetted by the relevant agency.

Before and after school activities

Where school premises are used by external organisations or individuals to provide before- or after-school activities, clubs, sports, tuition, community activities or other services for children, the school must ensure that appropriate safeguarding arrangements are in place.

Where the activity is provided by an external organisation, the school should obtain appropriate assurance that the provider has suitable safeguarding and child protection arrangements, safer recruitment processes and clear procedures for reporting safeguarding concerns. Appropriate safeguarding requirements must be included in relevant contracts, service level agreements or transfer of control arrangements.

Where activities are provided directly by the school or under the school's management and supervision, the school's safeguarding arrangements will apply.

Safeguarding concerns arising from activities provided by external organisations on school premises must be reported to the school without delay and managed in accordance with this policy.

Contracted services

Where external providers are contracted to provide services to the school, appropriate safeguarding requirements must form part of the commissioning and contract arrangements. The school should obtain appropriate assurance that providers understand their safeguarding responsibilities, have suitable safer recruitment arrangements and know how to report concerns involving students.

Where relevant, the school must ensure that safeguarding requirements are included within contractual arrangements and that appropriate liaison arrangements are established with the provider.

Lettings

Schools must ensure that safeguarding considerations form part of arrangements for letting or hiring school premises. Appropriate checks and due diligence should be undertaken on organisations and activities using the premises, including consideration of safeguarding, Prevent and reputational risks.

Where an external organisation is responsible for an activity, the organisation remains responsible for its own safeguarding arrangements, but must cooperate with the school and report any safeguarding concerns arising on the premises without delay.

Where a safeguarding allegation or concern arises in relation to an adult or organisation using the school premises to provide activities for children, the school will follow its safeguarding and allegations procedures and seek advice from the LADO where appropriate.

Emerging Safeguarding Risks

The Trust recognises that safeguarding risks evolve over time. Schools should remain alert to emerging risks identified through national and local safeguarding reviews, local safeguarding partnerships, police and community intelligence, Trust safeguarding analysis, student voice, technological developments and school-level quality assurance.

Where emerging risks are identified, schools should consider whether changes are required to safeguarding practice, staff training, risk assessments, policies or other safeguarding arrangements.

Oversight, monitoring and review

The Trust Board has overall responsibility for ensuring that Anthem Schools Trust fulfils its statutory safeguarding duties and that effective safeguarding arrangements are implemented across its schools. The Trust Board delegates day-to-day operational responsibility to school leaders while retaining strategic oversight and accountability.

Trustees and Academy Community Councils will seek assurance that:

- statutory safeguarding responsibilities are being met;
- safeguarding policies and procedures remain compliant with current legislation and statutory guidance;
- safeguarding culture is effective;
- safeguarding risks are identified, understood and appropriately mitigated;

- safeguarding training is effective;
- filtering and monitoring arrangements are appropriate; and
- quality assurance demonstrates continuous improvement.

Quality assurance, monitoring and analysis

Anthem Schools Trust uses safeguarding data, quality assurance activity and professional intelligence to monitor safeguarding practice and identify areas of strength, risk and improvement.

The Head of Safeguarding uses CPOMS, CPOMS Insight, Bromcom and the Trust Safeguarding Dashboard to identify safeguarding trends, vulnerable cohorts, emerging risks, training needs and areas requiring further support or challenge.

Deep Dive and Deep Dive Light visits are used to assess the implementation and effectiveness of safeguarding arrangements within schools. These may include review of safeguarding records and case files, discussions with DSLs, staff and students, and observation of safeguarding practice.

The Trust may commission external safeguarding reviews to provide independent assurance and professional challenge.

The Trust will also undertake appropriate safeguarding assurance of central and National Team arrangements.

Significant Safeguarding Incident (SSI) notifications, safeguarding data, Deep Dive findings and other relevant safeguarding intelligence will inform the Trust Safeguarding Dashboard and wider safeguarding assurance activity.

Safeguarding findings and identified actions will be reported through the Trust's established governance arrangements and monitored to completion.

Use of Safeguarding Data

Safeguarding data must be used proactively to improve practice and not solely for compliance purposes. Schools and the Trust should use safeguarding information to identify, where relevant:

- emerging risks;
- vulnerable cohorts;
- repeat or cumulative concerns;
- attendance patterns;
- exploitation indicators;
- training needs; and
- quality assurance priorities.

Trust-wide analysis will be undertaken regularly to identify themes, provide assurance and inform continuous improvement.

Serious safeguarding incidents

Any serious safeguarding incident must be managed in accordance with the Trust Significant Safeguarding Incident process. Where a serious incident meets the Trust's reporting threshold, the Headteacher must ensure that the Head of Safeguarding and relevant Trust leaders are informed without delay.

Serious safeguarding incidents will be reviewed to identify whether any changes are required to safeguarding practice, systems, training, risk assessment or policy.

Review of this policy

This policy will be reviewed annually by Anthem Schools Trust or sooner where:

- legislation or statutory guidance changes;
- local safeguarding arrangements change;
- learning from safeguarding reviews or serious incidents identifies the need for amendment; or
- Trust safeguarding arrangements materially change.

Significant amendments will be presented for appropriate Trust approval.

Additional safeguarding information and documentation

There are three appendices attached to this policy which supplement the information in this policy, they are:

- Appendix 1: Types of abuse and neglect.
- Appendix 2: Specific contextual safeguarding issues.
- Appendix 3: Useful statutory documents and guidance materials.

Anthem Safeguarding Strategy

This policy is underpinned by the Anthem Safeguarding Strategy, which sets out a Trust-wide vision for safeguarding that moves beyond compliance to embed a deeply rooted culture of safety, inclusion and shared responsibility. Over recent years, all Anthem schools have met core safeguarding requirements, establishing a solid foundation for this next phase. The strategy emphasises empowerment, inclusivity, and collaboration — placing safeguarding at the heart of everyday values, behaviours and decision-making. Through student and community engagement, stronger integration with inclusion and SEND, and targeted professional development, the Trust is creating environments where safeguarding is not simply a statutory duty, but a collective commitment to ensuring every child feels safe, valued and able to thrive.

Anthem Safeguarding Handbook

This policy is supported by the Anthem Schools Trust Safeguarding Handbook (June 2025), which provides detailed operational guidance for implementing safeguarding practice across all Anthem schools. The handbook complements this policy by offering practical resources, procedural checklists, and specific guidance for staff, safeguarding leads, and school leadership.

All staff and leaders are expected to be familiar with the contents of the handbook and use it in conjunction with this policy, statutory guidance (such as Keeping Children Safe in Education, September 2026), and relevant local procedures.

A copy of the Handbook is available to all staff via the staff shared drive and may be requested from the Designated Safeguarding Lead.

Anthem Attendance Ambitions

This policy is aligned with the *Anthem Schools Trust Attendance Ambitions* framework, which outlines strategic expectations and proactive approaches to improving attendance across all Anthem schools.

Attendance is a safeguarding issue, and persistent or unexplained absence may be an indicator of safeguarding risk. Staff must use the guidance within the Attendance Ambitions document to inform their early help strategies, interventions, and escalation procedures.

The Designated Safeguarding Lead and attendance team should work together to ensure attendance monitoring is embedded within safeguarding practice. The document is available on the Anthem intranet and from school leadership.

A copy of the document is available to all staff via the staff shared drive and may be requested from the Designated Safeguarding Lead.

Links with other policies

This policy links to the following policies and procedures:

- Administration of medicines and supporting students with medical conditions
- Allegations against staff
- Allergy Safety
- Alternative Provision
- Anti-bullying
- Appropriate Touch & Restrictive Intervention
- Attendance
- Behaviour & Ethos
- Curriculum
- Online Safety
- Exclusions
- First Aid
- Health and Safety
- Home Visits

- Induction
- Mobile Phones & Smart Technology
- Privacy notices
- Relationships and sex education and health education
- Risk Management
- Safer Recruitment
- School's Concerns and Complaints
- Staff Code of Conduct
- Whistleblowing

This Policy was evaluated and approved by the Trustees of Anthem Schools Trust in September 2026. This policy will be reviewed annually.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education September 2026.

Date reviewed:

Signed by:

Appendix 1: Forms of abuse and neglect

Abuse, neglect and exploitation are rarely standalone events and may overlap. A child may experience more than one form of abuse at the same time, and abuse may occur within or outside the home, in the community, in education or online.

Children may be harmed by adults or by other children. Abuse may be facilitated by technology or take place entirely online.

Staff should not rely on a single definition or indicator when considering whether a child may be at risk. **Professional curiosity and consideration of the child's individual circumstances are essential.**

If a member of staff has a concern about a child's welfare, they must follow the safeguarding procedures set out in this policy and report the concern to the DSL or DDSL without delay.

Physical abuse

Physical abuse is 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 occur where a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical abuse may be a single incident or occur over time and may be perpetrated by an adult or another child.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child that causes, or is likely to cause, severe and adverse effects on the child's emotional development.

It may include:

- conveying to a child that they are worthless, unloved or inadequate, or valued only insofar as they meet the needs of another person;
- persistent criticism, belittling, humiliation, name-calling or other verbal abuse;
- deliberately silencing a child, preventing them from expressing their views or making fun of how they communicate;
- imposing age or developmentally inappropriate expectations;
- overprotection or preventing a child from exploring, learning or participating in normal social interaction;
- causing a child to see or hear the ill-treatment of another person;
- serious bullying, including cyberbullying, which causes a child frequently to feel frightened or in danger; and
- exploitation or corruption of a child.

Emotional abuse may occur alongside other forms of abuse, although it can also occur independently.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening and whether or not violence is involved.

It may include:

- physical contact, including sexual assault or assault by penetration;
- non-penetrative sexual acts, including masturbation, kissing, rubbing or touching outside clothing;
- involving children in looking at or producing sexual images;
- making a child watch sexual activity;
- encouraging a child to behave in sexually inappropriate ways; and
- grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology may be used to facilitate abuse that takes place offline.

Sexual abuse can be perpetrated by adults or by other children, and by males or females.

Child-on-child sexual abuse is a specific safeguarding concern in education and must be recognised and responded to in accordance with this policy.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in serious impairment of the child's health or development.

Neglect may occur during pregnancy, for example as a result of maternal substance misuse.

Following birth, neglect may involve a parent or carer failing to:

- provide adequate food, clothing or shelter, including through exclusion from home or abandonment;
- protect a child from physical or emotional harm or danger;
- provide adequate supervision, including through the use of inadequate caregivers; or
- ensure appropriate medical care or treatment.

Neglect may also involve failing to respond appropriately to a child's basic emotional needs.

Exploitation

Children may be exploited by adults or other children and may not recognise that they are being exploited or understand themselves to be victims.

Exploitation involves an imbalance of power being used to coerce, manipulate or deceive a child into activities for the benefit of another person or group, or in exchange for something the child needs or wants.

Exploitation can take place online or offline and may include child criminal exploitation, child sexual exploitation, financial exploitation, trafficking and modern slavery.

Children who are being exploited must be treated as victims of abuse and safeguarding concerns must be responded to in accordance with this policy.

Further information about specific safeguarding issues, including child criminal exploitation, child sexual exploitation, domestic abuse, modern slavery, radicalisation, serious violence, honour-based abuse, FGM and forced marriage is provided in Appendix 2: Specific Safeguarding Issues.

Appendix 2: Specific safeguarding issues

Safeguarding issues often overlap and may place children at risk of multiple forms of harm. Staff should remain professionally curious and consider the child's individual circumstances, rather than relying on a single indicator.

The presence of an indicator does not, by itself, mean that abuse or exploitation is taking place. Staff should report concerns in accordance with the safeguarding procedures set out in this policy.

Adult-involved making or sharing of nudes and semi-nudes

Where an adult is involved in the making, requesting, obtaining, possessing, distributing or otherwise facilitating the making or sharing of nudes or semi-nudes involving a child, the incident must be treated as a child sexual abuse concern and referred immediately to the police and Children's Social Care.

An incident may initially appear to involve only children. Staff must therefore remain professionally curious and consider whether there are indicators of adult involvement, grooming, coercion or exploitation.

Adult involvement may be sexually or financially motivated.

Sexually motivated incidents

An adult offender may contact a child online, including by using a false identity or pretending to be another child. The offender may groom the child through social media, gaming platforms, chatrooms or messaging applications before requesting nudes and semi-nudes.

Potential indicators include a child being:

- contacted by an unfamiliar online account appearing to belong to another child;
- quickly engaged in sexually explicit communication;
- moved from a public platform to a private or encrypted platform;
- pressured or coerced into sexual activity or creating intimate images and/or videos;
- offered money, gifts, gaming credits or something else of value;
- threatened or blackmailed into sending further images or undertaking further sexual activity; or
- threatened with the distribution of existing or digitally manipulated images.

Financially motivated sexual extortion

Financially motivated sexual extortion involves an offender threatening to release intimate images and/or videos unless the child pays money or provides something else of value.

Offenders may use false identities, hacked accounts or digitally manipulated or AI-generated images.

Potential indicators include a child being:

- contacted by an unfamiliar account, including a compromised account belonging to another child;
- quickly engaged in sexually explicit communication;
- moved to a private or encrypted platform;

- pressured into creating intimate images and/or videos;
- told that their device or account has been hacked;
- threatened with the release of images or personal information; or
- blackmailed into sending money or providing bank account details.

Staff must not blame or shame a child involved in these incidents. The child's immediate safety and wellbeing must be prioritised and the matter escalated through safeguarding procedures.

Children absent from education

A child being absent from education, particularly repeatedly or without explanation, can be an indicator of abuse, neglect, exploitation, mental health difficulties, substance misuse, radicalisation, FGM or forced marriage.

Some children may be particularly vulnerable, including those who:

- are at risk of harm or neglect;
- are at risk of exploitation, FGM or forced marriage;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend education;
- are from new migrant families; or
- have other known vulnerabilities.

Schools will follow the Trust Attendance Policy and Missing Pupils Policy and consider attendance alongside the wider safeguarding context.

Where a child may be suffering, or is likely to suffer, harm, staff must follow the normal safeguarding referral procedures without delay.

Where a child leaves the school without a new school being named, or their name is removed from the admission register at a non-standard transition point, the school must comply with statutory notification and information-sharing requirements.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of child abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity.

The child may receive something they need or want, while the perpetrator or facilitator gains financial or other advantage. Violence or threats of violence may be involved.

CCE can occur online or offline and may include county lines, drug supply, forced criminality, shoplifting, theft or violence.

A child may be exploited even where their involvement appears consensual.

Potential indicators include:

- unexplained gifts, money or possessions;
- association with individuals or groups involved in exploitation or criminal activity;

- changes in emotional wellbeing or behaviour;
- substance misuse;
- going missing or regularly coming home late;
- repeated absence from education; and
- involvement in or association with criminal activity.

Staff must consider CCE alongside other safeguarding concerns and report concerns to the DSL without delay.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

It may involve an exchange for something the child needs or wants or for the financial or other advantage of the perpetrator or facilitator. Violence or threats of violence may or may not be involved.

CSE can occur online or offline and may involve contact or non-contact sexual activity.

Children may not recognise that they are being exploited and may believe that they are in a consensual or loving relationship.

Indicators may include:

- those associated with CCE;
- an older boyfriend or girlfriend;
- sexualised behaviour or communication that is out of context;
- unexplained gifts or money;
- sexually transmitted infections or pregnancy;
- going missing or staying away from home; and
- sharing sexual images and/or videos or engaging in sexual activity online.

Child-on-child abuse

Children can abuse other children. This can happen inside or outside school, online or face-to-face, and may occur simultaneously in both environments.

Child-on-child abuse may include:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- abuse in intimate personal relationships between children;
- physical abuse;
- sexual violence;
- sexual harassment;
- causing someone to engage in sexual activity without consent;
- consensual and non-consensual creation or sharing of nudes or semi-nudes;
- upskirting; and

- initiation or hazing-type violence and rituals.

Online child-on-child abuse may include abusive, harassing or misogynistic messages, non-consensual sharing of intimate images and/or videos and the sharing of abusive images or pornography with people who do not want to receive it.

The school has a zero-tolerance approach to sexual violence and sexual harassment. The absence of reports does not mean that such abuse is not taking place.

Staff must not dismiss harmful behaviour as "banter", "just having a laugh" or an inevitable part of growing up.

Where harmful sexual behaviour occurs, the school will consider the ages and developmental stages of those involved. Children displaying harmful sexual behaviour may themselves have experienced abuse or trauma and will be offered appropriate support.

The detailed response to child-on-child abuse is set out in the main body of this policy.

Domestic abuse

Children can experience domestic abuse directly or be adversely affected by seeing, hearing or experiencing its effects. Children who witness domestic abuse are victims of domestic abuse.

Domestic abuse may be physical, sexual, emotional, psychological or financial and may occur between intimate partners or family members. It can also include abuse in teenage relationships and child-to-parent violence and abuse.

Domestic abuse can have a significant and lasting impact on a child's emotional wellbeing, health, development, relationships and ability to learn.

Where the police notify the school of a domestic abuse incident affecting a child, the DSL will consider the information alongside the child's wider safeguarding circumstances and determine what support or safeguarding action is required.

Mount Street Academy is an Operation Encompass school. Operation Encompass is a national initiative that operates in partnership with Lincolnshire Police to support children who have been affected by domestic abuse. Following a police-attended domestic abuse incident where a child is present, ordinarily resident, or otherwise connected to the household, Lincolnshire Police will share relevant information with the school before the start of the next school day.

Notifications are received by the Designated Safeguarding Lead (DSL), Rachael Horn and DDSL, Sophie O'Hare, and are treated confidentially. The information shared allows the school to provide timely and appropriate support to the child, taking account of their emotional wellbeing, safety, and individual needs.

Following receipt of an Operation Encompass notification, the DSL will consider what support may be required. This may include wellbeing check-ins, additional THRIVE support, access to trusted adults, pastoral support, liaison with parents/carers where appropriate, and signposting or referrals to other services. The school will always seek to minimise distress and provide a safe, supportive environment for the child.

All information received through Operation Encompass is handled in accordance with safeguarding, confidentiality and information-sharing procedures and is used solely to support the welfare and safeguarding of children.

Operation Encompass information must be treated as confidential safeguarding information and handled securely. The DSL will determine whether further safeguarding action, support or information sharing is required.

Homelessness

Being homeless or at risk of homelessness presents a significant risk to a child's welfare.

The DSL and DDSLs should be aware of local housing authority contact details and referral routes so that concerns can be raised at the earliest opportunity.

Where a child has been harmed or is at risk of harm, the school's normal safeguarding procedures must also be followed.

So-called 'honour-based' abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the perceived honour of a family or community.

It can include:

- female genital mutilation (FGM);
- forced marriage;
- breast ironing; and
- other forms of abuse or violence committed in the name of perceived honour.

HBA may involve multiple perpetrators and wider family or community pressure.

All forms of HBA are abuse. Staff must not attempt to mediate between a child and family members where HBA is suspected and must report concerns immediately through safeguarding procedures.

Female genital mutilation

Female genital mutilation (FGM) is illegal and is a form of child abuse.

Staff should be alert to children who may be at risk of FGM and to indicators that FGM may already have taken place.

Potential indicators include:

- a family history of FGM;
- FGM being known to be practised in the child's community or country of origin;
- a parent or family member expressing concern that FGM may be carried out;
- a child being taken abroad or discussing a prolonged holiday to a country where FGM is prevalent;
- a child referring to a "special procedure", "special occasion" or becoming a woman;
- a child asking for help or expressing fear about a procedure;
- unexplained absence from school;
- difficulty walking, sitting or standing;
- difficulties urinating or frequent urinary, menstrual or stomach problems;
- avoiding physical activity or PE;

- significant emotional or behavioural change; or
- a child disclosing that FGM has taken place.

The indicators above are not exhaustive.

Where a member of staff discovers that FGM appears to have been carried out on a girl under 18, the mandatory reporting duty applies to regulated professionals and teachers. Staff must follow the procedure set out in the main body of this policy.

Forced marriage

A forced marriage is one entered into without the full and free consent of one or both parties where violence, threats or another form of coercion are used.

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

Potential indicators include:

- a child expressing fear about a marriage or relationship;
- family pressure relating to marriage;
- increased restrictions on movement or communication;
- sudden withdrawal from education or activities;
- plans for travel overseas;
- a child being taken out of the country unexpectedly; or
- a child disclosing concerns about marriage or family pressure.

Staff must recognise the one chance rule: there may be only one opportunity to speak to a potential victim and protect them.

Staff must not attempt to mediate with family members or contact them about the concern without appropriate safeguarding advice.

Where forced marriage is suspected, the concern must be reported to the DSL immediately. The DSL will follow local safeguarding procedures and seek specialist advice where required.

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- negate or destroy the fundamental rights and freedoms of others;
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve either of the above.

There is no single profile of a child who may be susceptible to radicalisation. Radicalisation can occur quickly or over a prolonged period and may take place online or offline.

Staff should remain alert to changes in behaviour, relationships, online activity, attitudes or presentation, while recognising that individual indicators can have many different explanations.

Schools will assess the risk of children being drawn into terrorism, maintain appropriate Prevent arrangements and ensure that staff receive appropriate Prevent awareness training.

Any concern that a child may be at risk of radicalisation must be reported to the DSL or Prevent lead and managed in accordance with the school's Prevent procedures.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur:

- between two children of any age or sex;
- between groups of children;
- online and face-to-face; and
- through physical, verbal or digital behaviour.

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

Sexual harassment may include:

- sexual comments, jokes or remarks;
- unwanted sexual comments or attention;
- sexualised online communications;
- sharing sexual images or material without consent;
- unwanted touching or sexualised physical behaviour; and
- other behaviour that creates a sexually hostile, degrading or intimidating environment.

Sexual violence includes rape, assault by penetration and sexual assault.

Schools must not tolerate or dismiss sexual violence or sexual harassment as "banter", "just having a laugh" or an inevitable part of growing up.

Victims must be taken seriously, reassured that they have done the right thing by reporting and never made to feel that they are creating a problem or should feel ashamed.

Schools will consider the needs of the victim, the alleged perpetrator and other children affected, as well as any wider cultural or safeguarding issues.

The detailed response is set out in the main body of this policy.

Serious violence

Children may be at risk from, or involved in, serious violence as victims, perpetrators or through criminal exploitation.

Potential indicators include:

- increased absence from education;
- changes in friendships or relationships, particularly with older individuals or groups;
- a significant decline in educational performance;
- signs of self-harm or significant changes in wellbeing;
- signs of assault or unexplained injuries; and
- unexplained gifts or new possessions.

Risk may be increased by factors including previous experience of maltreatment, involvement in offending, frequent absence from education, permanent exclusion or association with criminal networks.

Staff should report concerns about serious violence to the DSL, who will consider the child's wider circumstances and determine the appropriate safeguarding response.

Checking the identity and suitability of visitors

All visitors must comply with the school's visitor management arrangements, including signing in and out and wearing an appropriate visitor identification badge.

Where a visitor is unknown to the school, their identity and reason for visiting must be established before they are permitted access to the school.

Visitors attending in a professional capacity should provide appropriate identification. Where relevant, the school should obtain appropriate assurance that the individual has been subject to the required safeguarding checks by their employer.

The Headteacher or appropriate senior leader will use professional judgement to determine whether a visitor needs to be escorted or supervised.

Visitors must not be permitted to move around the school site without appropriate authorisation.

Where an individual or organisation is using school facilities to provide activities or services for children, the school must undertake appropriate safeguarding due diligence and ensure that relevant safeguarding requirements are understood and followed.

The school will not knowingly invite a speaker or organisation where there is a safeguarding concern about their suitability. Appropriate checks and risk assessment will be undertaken where relevant, including consideration of risks associated with extremism and terrorism.

Non-collection of children

The procedure must ensure that:

- reasonable attempts are made to contact the parent/carer or other authorised person;
- the child remains under appropriate supervision until safely collected or alternative arrangements have been agreed;
- staff know who has responsibility for the child if collection is delayed;
- appropriate action is taken where there are concerns about the child's immediate safety or welfare;
- repeated or concerning non-collection is considered as a potential safeguarding concern; and
- the incident is recorded appropriately.

Where a child is not collected and there are concerns about their welfare or immediate safety, the DSL should be informed and appropriate safeguarding advice or referral sought.

Missing students

Schools must have clear procedures to respond when a student is missing from the school site or otherwise cannot be accounted for.

The priority is to establish the student's whereabouts and return them to effective supervision as quickly and safely as possible.

The response should take account of the student's age, individual vulnerabilities, known risks and the circumstances in which they went missing.

Where a student is missing, staff must follow the school's Missing Pupils Policy and inform the DSL or DDSL where there is a safeguarding concern.

Where appropriate, the school will contact parents/carers, the police, Children's Social Care or other relevant agencies in accordance with the circumstances and the school's procedures.

Any safeguarding concerns arising from a missing student must be recorded on CPOMS and managed in accordance with this policy.

Appendix 3: Useful statutory documents and guidance materials

Statutory Safeguarding Guidance

- Keeping Children Safe in Education 2026 – Department for Education, September 2026.
- Working Together to Safeguard Children 2026 – Department for Education, statutory guidance.
- Children's Wellbeing and Schools Act 2026 – relevant provisions
- Early Years Foundation Stage (EYFS) Statutory Framework – Section 3: The safeguarding and welfare requirements – for schools with early years provision.
- What to do if you're worried a child is being abused: Advice for practitioners – Department for Education.
- Prevent duty guidance: England and Wales (2023) – Home Office, updated March 2024.
- Children Missing Education: Statutory Guidance for Local Authorities – current version.
- Working Together to Improve School Attendance – Department for Education, current version.
- Alternative Provision: Statutory guidance for local authorities, headteachers, school governing bodies and academy trusts – Department for Education, current version.
- Allergy safety in schools: statutory guidance – Department for Education, July 2026.
- Crime and Policing Act 2026 – relevant provisions relating to safeguarding and regulated activity.
- Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement – Department for Education statutory guidance, effective from 26 July 2026.

Safer Recruitment, DBS & Employment Checks

- Working or volunteering in regulated activity with children – Department for Education, including the guidance on the removal of the supervision exemption from 1 September 2026.
- Keeping Children Safe in Education 2026 – Part Three: Safer Recruitment.
- Teacher status checks: information for employers – Department for Education, current version.
- Disqualification under the Childcare Act 2006 – current government guidance.

Information sharing, data protection and record keeping

- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers – Department for Education, current version.
- UK GDPR and Data Protection Act 2018, as amended by the **Data (Use and Access) Act 2025**.
- Data protection guidance for schools – current Department for Education/Information Commissioner's Office guidance, as applicable.

Online safety and technology

- Keeping Children Safe in Education 2026 – Online Safety and Filtering and Monitoring requirements.
- Sharing nudes and semi-nudes: advice for education settings working with children and young people – current UK Council for Internet Safety guidance.
- Searching, screening and confiscation: guidance for schools – Department for Education.
- Mobile Phones in Schools – Department for Education, current guidance.
- Teaching online safety in schools – Department for Education, statutory guidance effective from 29 June 2026.

Behaviour, bullying and physical intervention

- Behaviour in schools: advice for headteachers and school staff – Department for Education, current version.
- Preventing and tackling bullying – Department for Education, current version.
- Restrictive interventions, including the use of reasonable force, in schools - Department for Education guidance effective from 1 April 2026.
- Searching, screening and confiscation in schools – Department for Education, current version.

Specific safeguarding concerns

- Domestic abuse: statutory guidance – current government guidance.
- Multi-agency statutory guidance on female genital mutilation – current version.
- Child sexual exploitation and child criminal exploitation guidance – current government guidance.
- Criminal exploitation of children and vulnerable adults: county lines – current government guidance.
- Modern Slavery: statutory guidance for England and Wales – current version.
- Prevent duty guidance: England and Wales – Home Office, current version.
- Channel Duty Guidance: Protecting people susceptible to radicalisation – current version.
- Sexual violence and sexual harassment between children in schools and colleges – Department for Education guidance.
- Domestic abuse and Operation Encompass – relevant current local and national guidance.
- Children with family members in prison – relevant current government guidance.