Heron Academy

Safeguarding Policy

Responsible post holder	Group Executive Director Safeguarding, Wellbeing and Inclusion DSL: **Ayfer Guncu, Heron Academy**
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1. Introduction to Safeguarding London South East Academies Trust

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We will provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow established procedures to ensure that children receive effective prevention, intervention and protection.

- It is everyone's responsibility to safeguard and promote the welfare of children.
- Children includes everyone under the age of 18.
- Children who are and feel safe make more successful learners.

Policies will be reviewed annually, unless an incident, new legislation or guidance suggests the need for an earlier review.

This policy has been reviewed and amended to reflect Keeping Children Safe in Education 2026, which has been published by the Department for Education for implementation from 1 September 2026.

The procedures contained in this policy apply to all staff and Trustees and are consistent with those of Local Safeguarding Children Partnerships and statutory safeguarding children partnership arrangements with our key partners.

Throughout the policies and procedures relating to safeguarding, reference is made to "children and young people" or "child protection." These terms are used to mean those under the age of 18, including unborn children. The Trust recognises that some adults are also vulnerable to abuse and so the policy and procedures should be applied (with appropriate adaptations) to allegations of abuse against, and the protection of, adults at risk. The Lord Chancellor's Department, in 1997, defined a vulnerable adult or adult at risk as a person 'who is, or may need community care services by reason of disability, age or illness; and is or may be unable to take care of, or unable to protect him or herself, against significant harm or exploitation'.

<u>Principles</u>

The London South East Academies Trust will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities, creating a culture of effective safeguarding.

All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection; Trust schools should always act in the best interests of the child. School leaders should ensure the child's wishes and feelings are considered when determining what action to take and what services to provide.

Safeguarding practice across the Trust will be child-centred, family-focused and informed by the child's lived experience. Records must show how the child's voice, wishes and feelings, communication needs, SEND, identity, trusted adult relationships and day-to-day

experiences have been considered. Where decisions are made that differ from the child's wishes, the rationale must be explained sensitively and recorded.

All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance; all staff should be aware that safeguarding and promoting the welfare of children is everyone's responsibility and identify children that may benefit from early help.

All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will then follow this policy guidance in dealing with such matters.

Aims

- To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children.
- To ensure consistent good practice across the Trust Schools.
- To demonstrate the Trust's commitment to safeguarding children.

This policy should be read in conjunction with:

- LSEAT e-Safety Policy
- LSEAT Preventing Extremism and Radicalisation Policy
- LSEAT Sexual Violence and Harassment Policy
- LSEAT Positive Handling Policy
- Trust Staff Code of Conduct

1.1 Safeguarding Legislation and Guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, the Academy Trust Governance Guide, and the statutory guidance Information Sharing to Safeguard Children and Young People (September 2026). It reflects the Information Sharing Duty under section 16LA of the Children Act 2004, in force from 30 September 2026, together with other statutory and non-statutory guidance relevant to safeguarding children in schools and academy trusts.

To safeguard and promote the welfare of children, LSEAT will act in accordance with current legislation, statutory guidance and local safeguarding partnership arrangements, including the following:

Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains schools' duties under the with respect to protecting people from the risk of radicalisation and extremism

Primary and All Through Schools Only: 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 the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

We work in partnership with the local authority and assess each child's level of need against localised threshold frameworks:

Lambeth Threshold Document

Southwark Threshold Document

Merton Threshold Document

Croydon Threshold Document

Bromley Threshold Document

Haringey Threshold Document

1.2 Duty of Care

Safeguarding incidents could happen anywhere and staff should be alert to concerns being raised in school.

Staff must take reasonable care to ensure that pupils do not meet with foreseeable injury. They have a duty to protect the children against foreseeable risks of personal injury or harm.

There must be an effective system of supervision in operation in the school.

The duty of care applies while the pupils are on the school premises during school opening hours. It may also apply if the pupils are present outside of official school hours, e.g. if they arrive early or leave late and the teacher/school has agreed to the pupils being present.

The same duty of care applies if a teacher voluntarily supervises children.

Teachers are required to follow good standards and approved practice. Some classes and activities require a greater degree of supervision. If goggles, protective clothing, etc. are supplied for certain activities, it is the teacher's duty to ensure that they are worn. If there is an adventurous activity then a written risk assessment will be completed by the class teacher, approved by the SLT and followed when such activities are carried out.

The wishes of the child or adult about whom a concern has been raised should be listened to. Wishes should be considered unless in doing so it is not possible -with an acceptable level of certainty - to mitigate the risk of harm either to the child/adult or to someone else. The wishes of the child/adult should be recorded as part of the records of the case.

The child's wishes and feelings should be considered and, where safe and appropriate, children and families should be informed about how and why information is shared. Consent is not a prerequisite for sharing information under the statutory Information Sharing Duty. Where information is relevant to safeguarding or promoting a child's welfare and may assist another safeguarding organisation to exercise its functions, it must be shared unless sharing would be more detrimental to the child than not sharing. Decisions and the rationale must be recorded.

All members of staff must always remain vigilant as Safeguarding is Everyone's Responsibility.

1.3 Safeguarding Children within the Context of SEND

At Heron Academy we recognise that children with special educational needs and disability, (SEND), are three times more likely to be abused than neurotypical peers. For example, some may have speech, language and communication needs which make it difficult to tell others what is happening.

We will ensure that all our pupils and specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

All staff will be mindful of the fact that our pupils can be disproportionally impacted by safeguarding concerns including child on child abuse.

Staff should not assume that indicators of abuse such as behaviour/mood change or injuries are related to the child's disability and to remain vigilant and mindful that children with SEND may not always outwardly display indicators of abuse.

Children with medical conditions may face additional safeguarding risks, including where treatment is withheld, symptoms are fabricated or induced, medication is misused, or health needs affect attendance and access to education. Staff must remain professionally

curious, avoid attributing safeguarding indicators solely to a medical condition, and share concerns promptly with the DSL.

2. Designated Safeguarding Team and Key Roles

2.1 The Role of the Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. The DSL is Ayfer Guncu-Assistant Principal. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

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

When the DSL is absent, the deputies Siobhan Heron and Isabella Kamara 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
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description in line with KCSIE 2026.

Headteachers / Heads of School must ensure that the DSL and deputy DSLs have sufficient capacity, protected time, supervision, training, resources and seniority to carry out the role effectively. This includes arrangements for cover during absence, regular review of safeguarding workload, access to case supervision, escalation routes for complex cases, and support following serious incidents or high-risk safeguarding activity.

2.2 The Role of Head Teacher

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

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the 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 undertake appropriate safeguarding and child protection 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

2.3 The Role of the Trust and Provision Boards

The Trust and Provision Boards will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Appoint a link trustee to monitor the effectiveness of this policy in conjunction with the Trust Board. The link trustee will not be a member of staff at the School.

The Chair of Trust Board will act as the 'case manager' if an allegation of abuse is made against the Deputy CEO.

All trustees will read Keeping Children Safe in Education in its entirety.

2.4 The Role of the Trust

The Trust will supply support and guidance to the Head Teacher/Head of School and the DSL. The Group Executive Director Safeguarding, Wellbeing and Inclusion can be consulted for advice and guidance but the decision-making regarding safeguarding remains at School level.

The Trust will also monitor the quality of safeguarding through regular audits and monitoring visits (See Appendix One).

2.5 Key Safeguarding Contacts

Name	Role	Contact Details
Ayfer Guncu	Designated Safeguarding Lead (Assistant Principal)	Ayfer.Guncu@heron.lseat.org.uk 0207 3265898
Siobhan Heron	Deputy Designated Safeguarding Lead	Siobhan.Heron@heron.lseat.org.uk
Isabella Kamara	Deputy Designated Safeguarding Lead	Isabella.Kamara@heron.lseat.org.uk
Melanie Hall- Judd	Headteacher	Melanie.Hall-Judd@heron.lseat.org.uk
Beth Moore	Group Executive Director Safeguarding, Wellbeing and Inclusion	beth.moore@lsec.ac.uk
Neil Miller	Deputy CEO: London South East Academies Trust	neil.miller@lseat.org.uk
Beverley Eaglesfield	Safeguarding Link Trustee	Contact the Governance Professional: Jennifer Pharo jennifer.pharo@lsec.ac.uk

3. Early Help

In line with Working Together to Safeguard Children 2026, the Trust supports the view that providing timely help, support and protection is more effective in promoting the welfare of children than reacting later. Early help and Family Help should provide support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.

Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child. Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of children and it is stated that schools are an important partner for the local authorities in which they operate.

Early help may include support provided directly by the school, support coordinated with partner agencies, or referral into local authority Family Help arrangements where needs are

more complex or require a multi-agency response. Staff must use local threshold guidance and discuss concerns with the DSL where a child's needs are not improving, where families are not engaging, or where risk appears to be increasing. The DSL will ensure that decisions, rationale, parental engagement, the child's wishes and feelings, agreed actions and escalation steps are recorded clearly on CPOMS.

School staff are particularly well placed to be alert to the potential need for early help for a child or young person who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs, whether or not they have an Education, Health and Care Plan
- has a mental health need, including concerns linked to self-harm, suicidal ideation, trauma or emotional distress
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, association with organised crime groups, county lines or serious violence
- is frequently missing, goes missing from education, home or care, or has concerning patterns of absence
- has experienced multiple suspensions, is at risk of permanent exclusion, or is in alternative provision or a pupil referral unit
- is at risk of modern slavery, trafficking, sexual or criminal exploitation, radicalisation or other forms of exploitation
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health needs or domestic abuse
- is misusing alcohol or other drugs
- is at risk of so-called honour-based abuse, including female genital mutilation, forced marriage or other harmful practices

School staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and work together to give children/young people the help they need. Staff receive training to develop their knowledge and skills in this area.

Where staff identify a cause for concern they should discuss this with a DSL. The DSL will make a referral if this is appropriate with the local multi-agency safeguarding hub (MASH) for the local authority area in which the child lives. Staff and pupils (where this is possible and appropriate) will be kept informed about the actions taken once the concerns are shared with the DSL. The local multi-agency threshold document for the local authority area where the school is going to make referral should be consulted.

If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any professional.

A child in need is defined under section 17 of the Act as a child whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired, without the provision of additional services. A child with a disability is a child in need.

3.1 Children who are LGBTQ+ and Questioning Their Gender

Where a child is questioning their gender, staff must take a cautious, child-centred and safeguarding-led approach. Schools will not initiate social transition; any request relating to a change of name, pronouns, uniform, facilities, sports, residential arrangements or records must be considered through safeguarding processes and led by the DSL with senior leader oversight. Decisions must be made on a case-by-case basis, with particular caution in primary settings, and must consider the child's age, maturity, SEND, mental health, peer relationships, family context, equality and human rights duties, the impact on other pupils and any relevant clinical or professional advice. Parents and carers should be involved as a matter of priority and in the vast majority of cases, unless there is a specific safeguarding reason why doing so may place the child at risk of significant harm. The rationale for decisions, safeguarding risk assessment, the child's wishes and feelings, parental involvement, agreed review points and any advice sought must be recorded on CPOMS.

Pupils who are lesbian, gay or bisexual are not inherently at risk. However, pupils who are LGBTQ+, or who are perceived to be LGBTQ+, can be targeted by others and may be vulnerable to bullying, harassment or abuse. Risks can be compounded where a pupil does not have a trusted adult or key worker with whom they can be open. LGBTQ+ inclusion will be featured in PSHE lessons and staff must provide safe spaces for pupils to talk, share concerns and seek support.

If a child or young person is questioning their gender, they should be encouraged, with their family or carers where appropriate, to seek clinical help and advice. Staff should work in partnership with parents and carers where the pupil is under 18, except in exceptionally rare circumstances where involving parents or carers would constitute a significant safeguarding risk to the child. Any support plan must be proportionate, regularly reviewed, and informed by the child's wishes and feelings, parental views, safeguarding considerations and relevant professional advice.

Where biological sex is recorded for statutory, safeguarding, medical, attendance, admissions, sports, single-sex spaces or risk assessment purposes, records must remain accurate and accessible only to staff who need this information to fulfil their safeguarding or statutory duties. Any support plan must make clear what has been agreed, who has been consulted, how risks will be managed, how privacy and dignity will be protected, and when the arrangements will be reviewed.

The school will provide and manage toilets, changing facilities, showers, residential accommodation and sporting activities in a way that protects the safety, dignity, privacy and wellbeing of all pupils. In accordance with statutory requirements, separate toilet facilities

will be provided for boys and girls aged eight and over, and separate changing and shower facilities will be provided for pupils aged 11 and over. Pupils will not be permitted to use toilet, changing or shower facilities designated for the opposite biological sex. Where a pupil does not wish to use facilities designated for their biological sex, the school will consider appropriate alternative arrangements, such as access to a private self-contained facility or alternative timings, provided these arrangements do not compromise the safety, privacy, dignity or wellbeing of any pupil, or the provision of single-sex facilities for others.

The school will ensure that overnight accommodation on residential visits is organised on a single-sex basis and that pupils do not share sleeping accommodation with pupils of the opposite biological sex. Where individual circumstances require alternative arrangements, these will be considered on a case-by-case basis through appropriate safeguarding, welfare and risk assessment processes. Where sporting activities are organised separately by sex for reasons of safety, fairness, competition or physical differences, the school will comply with relevant legislation, statutory guidance and governing body rules. All decisions relating to alternative arrangements will be documented, communicated appropriately, informed by safeguarding considerations and reviewed regularly to ensure the needs and rights of all pupils are protected.

4. Procedures for Managing Concerns and Disclosures

4.1 Suspicion of Harm

Safeguarding concerns often do not arise from a child disclosing but from a member of staff observing signs that there may be a concern. For example, this may be a change in behaviour, an unusual piece of writing or artwork or change in physical appearance.

In these circumstances staff should talk to the child, without asking leading questions, to ascertain if the child wants to share anything or if there is anything the school can help with.

Safeguarding concerns and any discussions with the child, including follow up actions, must be recorded on CPOMS and discussed with the DSL.

4.2 Responding to Disclosures

School staff who have regular contact with pupils are well placed to observe significant changes in a child's behaviour, a failure to thrive, outward signs of abuse or behaviour which may indicate a risk of being drawn into terrorism or other concerns. In addition, children may choose to share their concerns with staff they feel they can trust and with whom they are comfortable.

Staff need to know how to respond sensitively to a child's concerns and who to approach for advice. Whilst School staff are not responsible for investigating abuse it is essential that any disclosures or suspicions of significant harm, allegations of abuse, or concerns over potential radicalisation, are acted on and treated seriously.

The School takes a holistic view of the welfare of its pupils and recognises that a wide range of contextual factors may be impacting on the wellbeing of a child. These are likely to include family circumstances, friendship groups, the presence of specific vulnerabilities (see Early Help), attendance and behaviour and learning differences. The DSL will consider the full picture in dealing with cases brought to their attention.

The following guidelines should be followed by **all** staff receiving a disclosure:

- Stay calm and reassure the child that they are right to tell someone of their concerns.
- **Do not promise confidentiality.** Be honest - explain that you need to pass the information on and why while reassuring them that only the people who need to know will be told. The child can accompany you if they wish.
- Allow the child to speak in their own way and at their own pace, avoid interrupting when they are recalling significant events.
- Do not be judgemental but make a professional assessment about the likelihood of harm occurring.
- Do not 'interview' the child; do not ask leading questions. Ask factual questions to gather as much information as possible and to create a full picture of what has happened so that this can be reported to a safeguarding officer. Use the 4W's – who, what, when, where to guide you.
- Only clarify what the child is trying to say and ascertain whether there are any immediate issues of safety for them or any other children.
- **Notify the DSL** noting as accurately as possible what was said using the child's own words. Include the time, context and location of the disclosure.
- Do not investigate any suspicions, allegations or incidents of abuse, but report them within the hour (or as soon as practicable) to a DSL and record your concern on CPOMs.
- Do not contact the child's parents/carers. The DSL will seek advice from the local authority Children's Services, local Prevent Coordinator or other agency as appropriate.

Where there is a concern that a child is experiencing, may already have experienced abuse or neglect, is suffering or is likely to suffer 'significant harm' the Designated Safeguarding Lead will refer immediately to Children's Social Care (CSC) at the appropriate local authority.

Where there is concern of an immediate threat to life emergency services must be contacted immediately

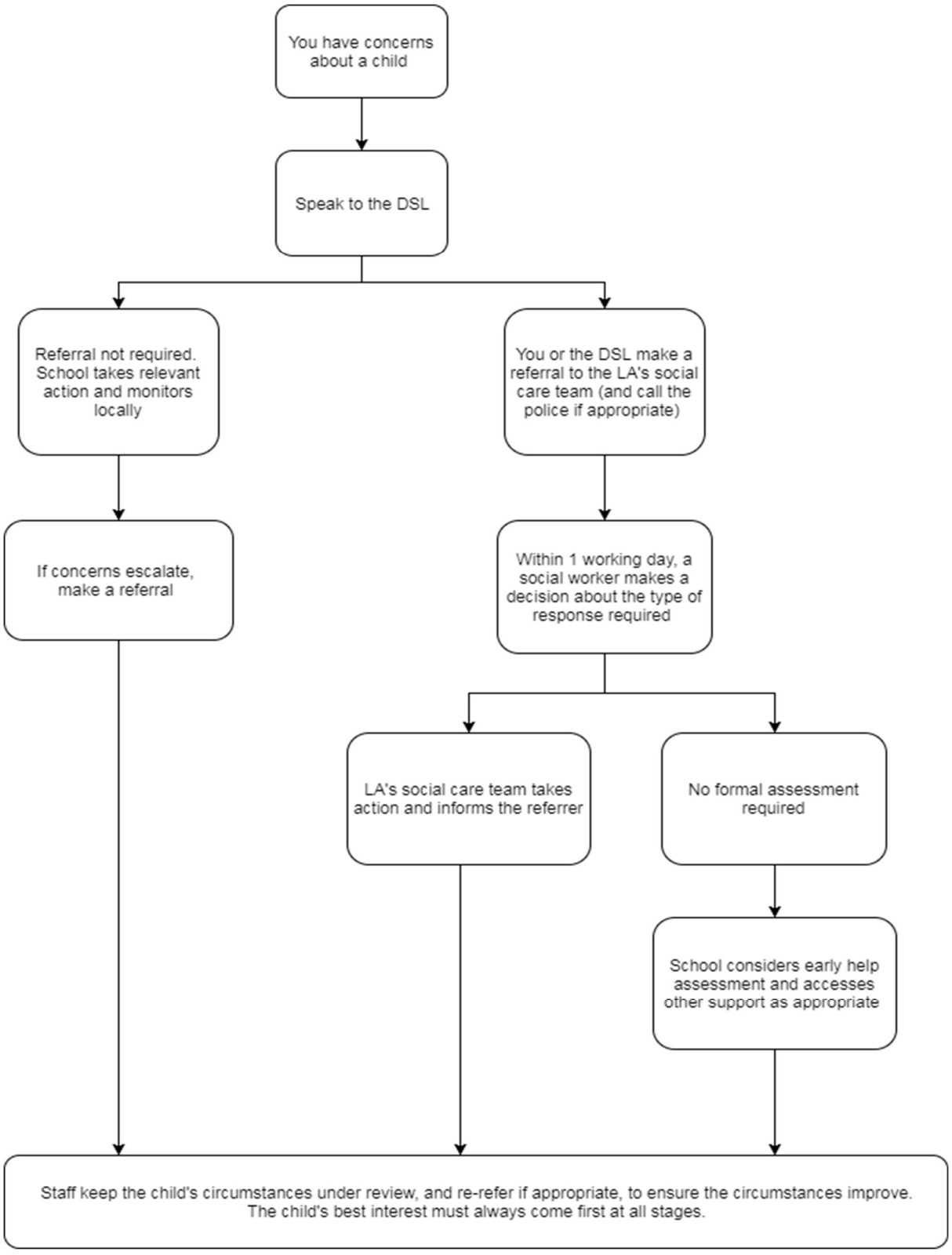
In exceptional circumstances, if the Designated Safeguarding Leads are not available advice should be sought from a member of the Senior Leadership Team, who will liaise with the

required services as appropriate. All staff have a right and responsibility to refer concerns directly to CSC if necessary.

4.3 Notifying parents

The Designated Safeguarding Leads will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern or disclosure.

However, if the DSL believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's social care.


You have concerns about a child
Speak to the DSL
Referral not required. School takes relevant action and monitors locally
You or the DSL make a referral to the LA's social care team (and call the police if appropriate)
If concerns escalate, make a referral
Within 1 working day, a social worker makes a decision about the type of response required
LA's social care team takes action and informs the referrer
No formal assessment required
School considers early help assessment and accesses other support as appropriate
Staff keep the child's circumstances under review, and re-refer if appropriate, to ensure the circumstances improve.
The child's best interest must always come first at all stages.

5. Abuse and Safeguarding Concerns

5.1 Indicators of Abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell.' It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the DSL.

Staff are responsible for reporting their concerns to the DSL and should not investigate their concerns.

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures, or other injuries,
- Show signs of pain or discomfort,
- Keep arms and legs covered, even in warm weather,
- Be concerned about changing for PE or swimming,
- Look unkempt and uncared for,
- Change their eating habits,
- Have difficulty in making or sustaining friendships,
- Appear fearful,
- Be reckless about their own or other's safety,
- Self-harm,
- Frequently miss school or arrive late,
- Show signs of not wanting to go home,
- Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn,
- Challenge authority,
- Become disinterested in their schoolwork,
- Be constantly tired or preoccupied,
- Be wary of physical contact,
- Be involved in, or particularly knowledgeable about drugs or alcohol, or,
- Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is important that all concerns are reported; 'absolute proof' is not needed that a child is at risk.

5.2 Abuse

To ensure that all our children are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation.

Staff must recognise that abuse and exploitation may overlap and may include modern slavery, trafficking, financial exploitation, coercion by organised networks, and child-to-parent or child-to-carer abuse. A child who has been coerced into offending may be a victim of exploitation and must be considered for safeguarding support, including referral through the National Referral Mechanism where appropriate.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse can take place online or in conjunction with online and in daily life. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

All staff should be aware that safeguarding incidents and poor behaviours can be associated with factors outside the school and/or can occur between children outside of school. This links closely with contextual safeguarding and specific children being more at-risk due to circumstances that they live in.

There are four main categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

5.3 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

5.4 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age, or developmentally, inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another or may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

5.5 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

5.6 Neglect

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

Neglect may occur during pregnancy because of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care takers, or the failure to ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

5.7 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of mental health problems. School staff are well placed however to identify those whose behaviour suggests that they may be experiencing a mental health problem or at risk of developing one.

Where children have suffered abuse, neglect, exploitation, domestic abuse or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff must be alert to rapid deterioration in presentation, self-harm, suicidal ideation, emotionally based school avoidance, eating difficulties, trauma responses, substance misuse, significant changes in behaviour, or concerns linked to online activity. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action must be taken in line with this policy, including discussion with the DSL, recording on CPOMS and referral to external services where required.

5.8 Child Criminal Exploitation (including County Lines)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they should discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

County Lines is a term used for gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated phone lines or other forms of deal line. They target vulnerable groups of children. The victims carry the drugs/ money and in return are offered, promised or given something in return – tangible such as cash, drugs or clothes or intangible such as status or protection. There is a direct link with CSE and CCE due to the imbalance of power. Victims can be coerced into county lines to prevent something negative happening to themselves or their family. The Government has now created a National Referral Mechanism (NRM) to support multi agency approach and unified approach by police forces.

5.9 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, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being

abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend/girlfriend/romantic partner
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they must discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

5.10 Children Missing Education, Attendance and Absence

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect or places them at a heightened risk of child criminal exploitation particularly county lines. School staff should follow the school's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM, forced marriage and Child Criminal Exploitation.

The law requires all schools to have an admission register and an attendance register. All pupils must be placed on both registers.

All Trust schools must comply with the School Attendance (Pupil Registration) (England) Regulations 2024 and the statutory Children Missing Education guidance updated in September 2025. Schools must maintain accurate admission and attendance registers, monitor attendance daily, identify concerning patterns promptly, and ensure safeguarding action is taken where absence may indicate neglect, exploitation, abuse, radicalisation, emotionally based school avoidance, unmet SEND or health needs, or children missing from education.

Before removing a pupil from the admission register, the school must complete and record reasonable enquiries, work with the local authority where a child's destination or whereabouts is unclear, and notify the local authority in line with statutory requirements. This includes pupils moving without a confirmed destination, pupils withdrawn for elective home education, pupils who fail to attend after expected admission, and pupils who may be receiving unsuitable education otherwise than at school.

All schools must inform the local authority where a pupil fails to attend regularly, is persistently or severely absent, has unexplained absence, or has been absent without permission for a continuous period of 10 school days or more. Attendance concerns must be considered alongside safeguarding records, behaviour, SEND, medical needs, exclusions, alternative provision and family context. Where absence creates or indicates risk, the DSL must ensure timely safeguarding escalation and recording on CPOMS.

5.11 So Called 'Honour Based Abuse' (HBA)

These encompass incidents or crimes which have been committed to protect or defend the honour of the family and/or community and includes FGM, forced marriages and practices such as breast ironing. This type of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

Any type of suspected HBA should be reported to the DSL and then local safeguarding procedures will be activated.

5.12 Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

As part of our PSHE curriculum, FGM and other harmful practices, including forced marriage and honour-based abuse will be covered. The school will ensure that pupils are taught the concepts of, and laws relating to forced marriage, honour-based violence and FGM, and how these can affect current and future relationships.

Actions

If staff have a concern regarding a girl that might be at risk of FGM they should inform the DSL. Since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach where FGM has taken place (see following section).

Mandatory Reporting

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a

girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

5.13 Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

If a member of staff suspects that a pupil is being forced into marriage, they must speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

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

5.14 Domestic Abuse

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/ or violence can have serious, long lasting emotional and psychological impact on children.

Operation Encompass allows police and schools to work together to provide emotional and practical help to children. Police will inform a key person at school if they have attended an incident of domestic violence/ abuse. This will allow the school to provide essential support for the child. All DSLs should complete the accompanying training for Operation Encompass to register for this service.

5.15 Child on Child Abuse

Child on Child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

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

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

5.16 Sexual Violence and Harassment

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face, including through harmful sexual behaviour, misogynistic abuse, online misogynistic influence, coercion, image-based abuse, AI-generated or manipulated content and deepfakes

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

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This can adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Sexual violence and harassment is not tolerated and is never acceptable.

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

Staff should be aware of the importance of:

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

It is crucial that children and young people are informed about consent and understand that consent can be given to some activities but not to others or can be removed at any time.

- Children under 13 can never give consent
- The age of consent is 16
- Sexual intercourse without consent is rape

Staff should refer to the Trust's Sexual Violence and Harassment Policy for more information.

5.17 Serious Violence

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

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

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

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

Any concern that a child is carrying a weapon, has used a weapon, has threatened to use a weapon, is associated with individuals involved in serious violence, or has expressed an intention to use violence must be reported immediately to the DSL. The DSL will assess the level of risk, consider contextual safeguarding factors, attendance disruption, exclusion risk, alternative provision, exploitation, peer conflict, online influence and local serious violence intelligence. The DSL will involve parents or carers where appropriate, seek advice from local safeguarding partners or police where required, and ensure that early, evidence-based support is considered. This may include access to a trusted adult, social and emotional support, mentoring, therapeutic intervention, safety planning, targeted preventative education or referral to specialist services. All actions, decisions and review arrangements must be recorded.

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

Schools will use teachable moments, curriculum opportunities, behaviour support, attendance monitoring and partnership working to prevent escalation into serious violence. Where risk is identified, support will be coordinated through early help, safeguarding, pastoral, SEND and external agency pathways as appropriate.

5.18 Radicalisation and Extremism

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation is the process of a person legitimising support of, or use of, terrorist violence.

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

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes considerable damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The school has a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

The school will assess the risk of children being drawn into terrorism. This assessment will be based on an understanding of the potential risk in the local area, in collaboration with our local safeguarding partners and local police force.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over an extended period.

Staff will be alert to changes in pupils' behaviour.

The charity NSPCC says that signs that a pupil is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they should discuss their concerns with the DSL and record on CPOMS.

Staff should always act if they are worried.

Further information on the school's measures to prevent radicalisation is set out in the Preventing Extremism and Radicalisation Policy.

5.19 The Impact of Abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond

their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

5.20 Responding to a Concern

Key points to remember for acting are:

- In an emergency where a child is in immediate danger or at risk of harm take the action necessary to help the child and inform the DSL and/or a member of SLT immediately.
- If your concern is not an emergency report your concern to the DSL before the end of the day.
- If the DSL/Deputy DSL is not available, ensure the information is shared with the most senior person in the school that day and ensure action is taken to report the concern to children's social care (if applicable).
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- Write up your concern on CPOMS using factual information only
- Seek support for yourself if you are distressed.

5.21 Referrals to Children's Social Care

The DSL will make a referral to children's social care, in line with local reporting arrangements and thresholds, if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

5.22 Reporting Directly to Children's Social Care

Staff should follow the reporting procedures outlined in this policy.

However, they may also share information directly with children's social care, police or the NSPCC if:

- The situation is an emergency and the designated senior person, their deputy, and the Head Teacher are unavailable.
- They are convinced that a direct report is the only way to ensure the child's safety.

5.23 Preventative Education

Safeguarding is embedded through a planned, age-appropriate preventative curriculum, including PSHE, RSHE, online safety, assemblies, tutor time and wider enrichment. Pupils will be taught how to recognise risk, make safe choices, seek help and report concerns. This will include, where age and stage appropriate, healthy and respectful relationships, consent, child-on-child abuse, sexual harassment and violence, misogyny, harmful online influence, AI-generated content and deepfakes, online safety, mental health and wellbeing, self-harm,

exploitation, radicalisation and extremism, substance misuse, serious violence, harmful practices and how to access trusted adults and support services.

The DSL, curriculum leaders and senior leaders will work together to ensure that preventative education responds to emerging safeguarding themes, local context, pupil voice, behaviour and attendance data, safeguarding records and national guidance. Curriculum content will be reviewed regularly and adapted where safeguarding intelligence indicates increased risk.

6. Online Safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

<u>The 4 key categories of risk</u>

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

- Content – being exposed to illegal, inappropriate or harmful content, for example pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation, conspiracy theories, harmful online influence and AI-generated or manipulated content.
- Contact – being subjected to harmful online interaction with other users, such as peer and friendship pressure, commercial advertising, adults posing as children or young adults, grooming, exploitation, coercion, harassment or abuse facilitated by technology.
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, receiving or sharing explicit images, consensual or non-consensual self-generated intimate images or videos, AI-generated intimate images, deepfakes, cyberbullying, abusive messaging and online sexual harassment.

- Commerce – risks such as online gambling, inappropriate advertising, phishing, scams, extortion, financial exploitation and other cyber-enabled harms.

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of the curriculum, including the safe use of social media, the internet, mobile and smart technology, artificial intelligence and image-sharing platforms.
- Teach pupils how to keep personal information private, recognise unacceptable behaviour online and report concerns, including where they are a witness rather than a victim.
- Ensure staff training includes cyberbullying, online radicalisation, grooming, harmful online influence, misogynistic content, AI-generated content, deepfakes and self-generated intimate images or videos.
- Educate parents and carers about online safety through the website, communications and events, including how to raise concerns about online or technology-facilitated harm.
- Make sure staff understand restrictions on the use of mobile phones, cameras, smart watches and personal devices, including that staff must not take photographs or recordings of pupils on personal devices.
- Make all pupils, parents, carers, staff, volunteers and governors aware of acceptable-use expectations for the internet, school ICT systems, mobile technology, smart technology and AI tools.
- Explain sanctions and safeguarding responses where pupils breach acceptable-use, online safety or mobile phone policies.
- Ensure staff, pupils and parents or carers are aware that staff have powers to search pupils' phones where lawful and appropriate, in line with DfE guidance on searching, screening and confiscation.

Put in place robust filtering and monitoring systems, review their effectiveness at least annually, respond promptly to concerns identified through monitoring, and ensure systems consider all school devices, internet-connected technology, apps, embedded browsers, cloud services, off-site use of school devices where applicable, anonymising services, VPNs, encrypted traffic limitations, AI tools, image-generation tools, harmful online influence and emerging online risks. Outcomes from the review will be reported to Trust senior leaders and school leaders, with actions tracked to completion.

The Group Director of Emerging Technologies and Trust Information Systems is responsible for coordinating the annual Trust review of filtering and monitoring arrangements to ensure systems are effective in safeguarding children online and protecting against cyber security risks. The review must consider whether filtering and monitoring can address real-time, dynamic, personalised and AI-generated content; whether illegal-content protections, including child sexual abuse material and terrorist content blocklists, cannot be disabled or bypassed; whether user activity can be attributed to individuals; whether alerts are reviewed by staff with appropriate safeguarding expertise; and whether response times are

effective. Outcomes and actions will be reviewed at the Safeguarding Steering Group and Trust SLT and reported to Trust Board.

All schools will operate as mobile phone-free environments by default throughout the school day, including lessons, movement between lessons, breaktimes and lunchtimes. Any exception must be agreed in advance for a clear medical, SEND, safeguarding or welfare reason, recorded by the school and reviewed regularly. Mobile phones, smart watches and other smart technology with similar functionality must not be used to record, photograph, message, access social media or share content during the school day unless expressly authorised for a specific educational, medical or safeguarding purpose.

This section summarises our approach to online safety and mobile phone use. For comprehensive details please view the Trust's e-safety policy.

Artificial intelligence (AI)

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

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

AI-enabled safeguarding risks include AI-generated intimate images, deepfakes, impersonation, grooming, coercion, cyberbullying, harmful chatbots, misinformation, disinformation, extremist content, self-harm content and the manipulation of images, audio or video to harass, exploit or abuse pupils.

LSEAT will treat any use of AI to access harmful content, generate or share harmful material, impersonate others, bully, harass, groom, exploit, coerce or abuse pupils in line with this policy, the school's behaviour policy, anti-bullying policy, online safety policy and sexual violence and harassment policy where relevant. AI-related safeguarding incidents must be recorded on CPOMS, escalated to the DSL and managed using safeguarding procedures.

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

Where AI tools are used in school, leaders must ensure that safeguarding, data protection, equality, curriculum and information security risks are considered before implementation. Pupils must not be encouraged to use AI tools in ways that expose them to harmful content, unsafe contact, inappropriate data sharing, impersonation, image-based abuse or inaccurate safeguarding advice. Any suspected AI-enabled abuse or harmful online behaviour must be treated as a safeguarding concern and escalated to the DSL.

7. Confidentiality, Sharing Information and Record Keeping

All staff must understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child, but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL/DDSLs, Head of School/Headteacher, Trust Safeguarding, Deputy CEO Trust or Chair of Trust Board (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with UK GDPR and the Data Protection Act 2018. Information is:

- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate.
- Kept no longer than necessary.
- Processed in accordance with the data subject's rights.
- Secure.

Records are kept on a secure server CPOMs. All written records must be stored in a locked facility and information sent electronically must be password protected and made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. No child protection information will be stored on portable media, such as a CD or flash drive. Child protection information will be stored separately from the child's 'school file' and the 'school file' will be 'tagged' to indicate that separate information is held.

Child protection records may be exempt from disclosure where releasing information would be likely to cause serious harm, prejudice a safeguarding enquiry, identify another person, or otherwise be unlawful. If any member of staff receives a subject access request from a child, parent or carer to see child protection records, they should refer the request to the Headteacher who will seek advice from the Group Data Protection Officer.

UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing or withholding information with relevant agencies where doing so is necessary and proportionate to safeguard a child.

The Trust's policy on confidentiality and information-sharing is available to parents and children on request.

Staff must follow the Department for Education statutory guidance Information Sharing to Safeguard Children and Young People (September 2026), Keeping Children Safe in Education 2026 and local multi-agency arrangements. From 30 September 2026, section 16LA of the Children Act 2004 places a statutory Information Sharing Duty on relevant safeguarding

organisations. Where LSEAT or its staff hold information that they consider relevant to safeguarding or promoting the welfare of a child, and sharing may assist another relevant organisation to exercise safeguarding functions, the information must be shared unless sharing would be more detrimental to the child than not sharing.

Information-sharing decisions must be child-centred, timely and anti-discriminatory. Staff must consider the relevance of all information held, including information about parents, carers, siblings or other people connected to the child where this may help another organisation understand risk, need or protective factors. The duty applies to safeguarding and promoting welfare, not only where significant harm or a child protection threshold has been reached. Consent is not required to comply with the duty, although children and families should be informed where it is safe and appropriate to do so.

Information must be adequate, relevant, accurate, timely and shared securely. Staff should share what is relevant to the safeguarding or welfare purpose and must not apply a blanket "need-to-know only" approach that prevents relevant information reaching an appropriate safeguarding organisation. Decisions to share, delay, limit or withhold information must be recorded on CPOMS, including what was considered relevant, what was shared, with whom, when, the lawful basis, the rationale, any detriment assessment and advice sought. Where staff are unsure, they must seek advice from the DSL, Headteacher/Head of School, Trust safeguarding lead or Group Data Protection Officer, but advice-seeking must not delay action where a child may be at risk.

7.1 Record Keeping and Transferring Files

All concerns, discussions, decisions made and reasoning for decisions must be recorded on CPOMS.

Records must also show the child's voice and communication needs; what information was shared, with whom, when and by what secure method; the rationale for sharing or not sharing; any assessment of possible detriment to the child; confirmation of receipt where appropriate; outcomes; and review arrangements.

Records should 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 outcome.

When a child transfers to a new school, either at the start of an academic year or mid-year, their child protection file must transfer to the new school within five working days. This should be transferred separately from their main pupil file, sent securely and confirmation of receipt obtained. The school must also consider if there is other information that should be shared prior to the transfer to help safeguard or support that can be put in place.

Relevant safeguarding information must follow the child promptly across transitions between schools, alternative provision and other services. The DSL must consider whether

information should be shared before the formal file transfer so that support, risk management and protective arrangements are in place from the point of transition.

8. Children with a parent or close relative in prison or at risk of custodial sentence.

The London South East Academies Trust is committed to support the children and young people who have a parent or close relative in prison and will:

Raise awareness of the needs of the pupils with a parent or close relative in prison.

- Secure the educational achievement and attendance of those pupils during their time in our school.
- Promote their social inclusion and equal opportunities within our school community.

The DSL or Deputy DSL for the relevant site will be appointed as 'Designated Person for Children of Prisoners' and their role will include:

- Keeping the Headteacher fully informed of pupils with a parent in prison.
- Liaise with other relevant school staff on a 'need to know' basis.
- Provide a point of contact in the school for external agencies in order to share information.
- Liaise with the family and seek their consent to provide additional support for the child as necessary.
- Liaise with other statutory and voluntary agencies as appropriate.
- Promote the use of the Common Assessment Framework (CAF)/ Early Help to identify the needs of the child unless a Core Assessment has been completed.
- Consider convening a multi-agency meeting to address the needs of the child and to identify a key worker for that child following the completion of a CAF /Early Help.
- Consider the use of an individual education plan for the child concerned.
- Monitor the achievement, attendance and behaviour of the child with a parent or close relative in prison.
- Act as an advocate for children with a parent/ close relative in prison, particularly if the child is a Looked After Child (LAC) as they often have lower rates of visiting a parent in prison.
- Consider purchase of books and resources about prisons and prisoners for the school library.
- Keep appropriate and current records with reference to information sharing.

9. Supporting Young Carers

The London South East Academies Trust believes that all children and young people have the right to an education, regardless of what is happening at home. When a young person looks after someone in their family who has a serious illness, disability or substance misuse

problem, he or she may need extra support to help them get the most out of school. We will help any pupil who helps to look after someone at home.

Heron Academy will:

- Designate a member of staff with special responsibility for young carers. This member of staff will introduce themselves and their responsibilities to all new pupils.
- Run PSHE lessons including the challenges faced by young carers during year.
- Consider referring young carers to the local Young Carers Service and identify other support groups in the community.
- Ensure we are accessible to parents who have mobility and communication difficulties and ensure they are given the opportunity to be involved in Academic Review Days (or similar).
- Respect right to privacy and only share information with those who need to know.
- Consider alternatives if a young carer is unable to attend out of school activities e.g., detention, sports coaching, concerts, due to their caring role.
- Allow young carers to telephone home during breaks and lunchtimes.
- Provide advice to parents regarding transporting their children to school where there are difficulties in this area.

10. Looked-after and previously looked-after children

Schools will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- There is an appointed designated teacher, Ayfer Guncu, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children 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 that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

11. Reporting and Dealing with Allegations of Abuse Against Members of Staff

KCSIE 2026 confirms that the Headteacher is the main contact for managing allegations against staff, supply staff, trainee teachers, contractors, volunteers and any other adult working in or on behalf of the school. The DSL may support the process, but overall responsibility remains with the Headteacher unless the allegation relates to them.

The Group Executive Director Safeguarding, Wellbeing and Inclusion and Deputy CEO should be consulted on all allegations that meet threshold of harm.

This procedure applies to all staff, including agency staff, employed by or working on behalf of LSEAT. HR to maintain records of current and previous staff.

In the event of an allegation about the Headteacher the Deputy CEO will act as lead. In the event of an allegation about the Deputy CEO, the Chair of the Trust Board will act as lead in consultation with the Group Executive Director Safeguarding, Wellbeing and Inclusion. Where the allegation relates to a trainee teacher, agency worker, contractor or volunteer, the school will liaise with the relevant employer, training provider or organisation while ensuring the safeguarding response is not delayed.

In rare instances, staff working in education have been responsible for abusing children or adults at risk. Alternatively, because of their frequent contact with children and young people, staff may have allegations of abuse made against them. The School recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

It is also recognised that hasty or ill-informed decisions in connections with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the School will do so with sensitivity and will act in a careful, measured way.

11.1 Receiving an Allegation about a Member of Staff from a Child at Risk

The allegation should immediately be shared with the Headteacher who will:

- obtain written details of the allegation from the person who received it, signed and dated wherever possible. The written details should be countersigned and dated by the person leading the response.
- record information about times, dates, locations, names of potential witnesses, immediate safeguarding action taken, whether the allegation relates to a member of staff, supply staff, trainee teacher, contractor, volunteer or other adult working on behalf of the school, and whether there may be transferable risk outside school.

If an allegation is made against a member of staff who is not directly employed by the School, the School will liaise and work with the Agency and the LADO. Consideration of both the Schools and the Agencies policies will form a joint decision about the outcome of an internal investigation.

11.2 Initial Assessment

Headteacher or DSL should make an initial assessment of the allegation consulting with HR, Trust Safeguarding, as well as the Local Authority Designated Officer (LADO) as appropriate. Where the allegation is either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LADO.

The School is not to investigate the allegation without being advised by the LADO that an internal investigation is appropriate. The initial assessment should be based on the information received and to determine whether the allegation warrants further investigation.

Potential outcomes of the initial assessment are:

- The allegation meets the harm threshold
- The allegation/concern does not meet the harm threshold and will be dealt with in line with Trust staff disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true

11.3 Allegations that may meet the harm threshold

The procedures appearing below for the management of allegations apply to all cases in which it is alleged that a teacher or other member of staff (including volunteers) in the School has:

- behaved in a way that has harmed a child or adult at risk, or may have done so;
- possibly committed a criminal offence against or related to a child or adult at risk;
- behaved towards a child or adult at risk in a way that indicates she or he would 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.

This relates to members of staff who are currently working in the School regardless of whether the School is where the alleged abuse took place. Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

This includes behaviour that may have happened outside of school and that may make an individual unsuitable to work with children, this is referred to as transferable risk.

Allegations that may meet the threshold of risk will be referred to the LADO and the Group Executive Director Safeguarding, Wellbeing and Inclusion Headteacher /HR will take instruction and advice on how to proceed whilst also ensuring:

- The welfare of the child is considered, supported and not at further risk.
- The person subject to the allegation is supported as appropriate with consultation with the LADO.

11.4 Enquiries and Investigations

Child protection enquiries by social care or the police are not to be confused with internal, disciplinary enquiries by the School. The School may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the School to act in a particular way; however, the School should assist agencies with their enquiries.

The School shall hold in abeyance its internal enquiries while any formal police or local authority social care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall comply with existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, Headteacher, the Group Executive Director Safeguarding, Wellbeing and Inclusion and/or the Director of HR should normally be involved in, and contribute to, the inter-agency strategy discussions. They are responsible for ensuring that the School gives every assistance to the agency's enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. HR shall advise the member of staff that they should consult with a representative such as a trade union.

Unless there are objections from the police or other investigating agency, Headteacher shall:

- ensure that the parents/carers of the child or adult at risk making the allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the child/children, adult at risk or parents/carers making the allegation that the investigation is taking place and what the likely process will involve
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the process will involve

Written records will be kept of the action taken in connection with the allegation.

11.5 Suspension of Staff

Suspension should not be automatic, but may be considered at any stage of the investigation and should remain under review: All options to avoid suspension should be considered prior to taking that step. The possible risk of harm to children at risk posed by an accused person should be evaluated and managed in respect of the child/ren at risk involved in the allegations.

The appropriate section of the Staff Disciplinary Policy and Procedure should be followed. The Headteacher and HR shall consider carefully who is informed of the suspension and investigation. The LADO and external investigating agencies should be consulted.

If there is no option but to suspend the member of staff, they should be given appropriate support during the period of suspension. They should also be provided with information on progress and developments in the case at regular intervals.

11.6 The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the Staff Disciplinary Policy and Procedure following advice provided by a senior member of the HR team.

11.7 Resignations and dismissals

If during an investigation relating to an allegation of abuse, an employee tenders their resignation, or ceases to provide their services, the School is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or adults at risk, including those where the person concerned refuses to co-operate with the process.

If the School dismisses or ceases to use the services of a member of staff because of serious misconduct or might have dismissed them if they had not resigned, the School must still consider whether a referral to the Disclosure and Barring Service is warranted. If the criteria for a referral are met, it is not appropriate to reach a settlement/compromise agreement.

11.8 Unfounded or malicious allegations

If the allegation is found to be unsubstantiated, the DSL will refer the matter to children's social care so that it can be determined whether the child or adult at risk needs support services or may have been abused by someone else.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual/s who made it in accordance with behaviour policy.

In consultation with HR, the Headteacher will:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
- inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

11.9 Low Level Concerns

We encourage an open and transparent culture where all concerns about an adult working with children which do not meet threshold are dealt with promptly and appropriately.

A low level concern is described in KCSIE 2026. It does not mean it is insignificant – it is any concern no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside work, transferable risk or behaviour that could undermine professional boundaries
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO, although the LADO may be consulted for advice where appropriate
- May relate to any adult working in or on behalf of the school, including staff, supply staff, trainee teachers, contractors, volunteers and visitors
- Examples of such behaviour could include, but are not limited to, being over friendly with pupils, having favourites, taking photographs of pupils on a personal device contrary to policy, engaging with a pupil one-to-one in a secluded area, humiliating pupils, failing to maintain appropriate professional boundaries online, or failing to self-report a change in personal circumstances that may create a safeguarding concern.

Low-level concerns may arise in several ways and from several sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or because of vetting checks undertaken.

Low-level concerns can be self-referrals if staff are aware of a situation that should be noted and reviewed.

If a member of staff has any concerns, no matter how minor, they should be shared directly with the Headteacher, this role can be delegated to the DSL by the Headteacher.

A low-level concern form should be completed and shared to keep a record (Appendix 2).

Low-level concerns can be shared anonymously and where possible anonymity will be preserved.

Following receiving a low-level concern form, the senior lead will review and assess the concern and speak to any staff members. If assessed as meeting LADO threshold then LADO processes will commence. Outcome of low-level concern could be:

- No Further Action
- Organisational learning/culture development
- Training
- Disciplinary (in line with Disciplinary Policy)

Low-level concerns regarding agency staff and contractors should be referred to their employers.

Records will be kept for the duration of the staff member's employment with LSEAT.

Low-level concern records will be reviewed periodically to identify patterns, repeated behaviours, cultural concerns, training needs or wider organisational learning. Where a pattern emerges, senior leaders will consider whether the matter now meets the harm threshold, whether LADO advice is required, and whether action is needed under the staff code of conduct, capability, disciplinary or safeguarding procedures.

Information about low-level concerns will not be included in references unless it relates to substantiated safeguarding concerns, meets the harm threshold, or is otherwise required in accordance with safer recruitment, statutory guidance or legal obligations.

11.10 Staff Code of Conduct and Sharing Personal Circumstances

Staff are expected to read, understand and adhere to the staff code of conduct, reviewing the expectations at a minimum at the beginning of every academic year.

As well as safer recruitment checks, it is a requirement for all staff to share if their personal circumstances change that may affect their work and suitability to work with children. This includes (but not exhausted to):

- Subject to a police investigation or new criminal conviction
- Open to a section 17 or 47 investigation or children in their personal care are open to Child in Need or Child Protection Plan
- A personal situation which may result in their circumstances being a transferable risk to the children they are working with.

Following a member of staff informing the Headteacher they will review and risk assess the potential risk in consultation with the Group Executive Director Safeguarding, Wellbeing and Inclusion, Deputy CEO, Director of HR and the LADO as appropriate.

11.11 Staff Use of Personal Electronic Devices

The use of personal electronic devices with imaging and sharing capabilities (mobile phones, iPads, video recorders, cameras, smart watches, etc) is not permitted in Heron Academy when in the presence of children or when on school outings.

All personal electronic devices with imaging and sharing capabilities should be stored securely in a designated area.

Staff are permitted to use their personal electronic devices in designated areas only or during non-contact time.

Staff should see the mobile phone and devices policy for more information.

11.12 Confidentiality

It is essential that when an allegation is made, the School makes every effort to keep confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher

who has been accused by, or on behalf of, a pupil from the same school (where the material would identify the teacher as the subject of the allegation).

The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so.

Senior case leads should take advice from, for example, police and children's social care to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

11.13 On concluding a case

If the accused member of staff leaves the employment of the School a decision must be made about whether to make a referral to the DBS and in the case of a member of teaching staff, whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Headteacher should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The Headteacher should also consider how the person's contact with the child or adult at risk who made the allegation can best be managed.

11.14 Records

Documents relating to an investigation should be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

If a member of staff is dismissed or resigns before the disciplinary process is completed, they should be informed about the School's statutory duty to inform the DBS.

11.15 Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Headteacher /DSL, at the conclusion of the investigation and any disciplinary procedures, consider whether there are

any matters arising from it that could lead to the improvement of the School's procedures and/or policies. Consideration should also be given to the training needs of staff.

12. Safer Recruitment

London South East Academies Trust will follow Part Three of Keeping Children Safe in Education 2026 and maintain a safer recruitment culture which deters, identifies and rejects people who may be unsuitable to work with children.

Safer recruitment covers all aspects of the recruitment process from advertising the role to inducting the new member of staff into the organisation.

Regulated activity decisions must reflect the law and KCSIE 2026. Schools must not rely on the former supervision exemption for volunteers who teach, train, instruct, care for or supervise children regularly. The nature, frequency and opportunity for contact must be assessed and the appropriate enhanced DBS and children's barred list checks completed before regulated activity begins.

A safer recruitment process must include:

- An advert which clearly outlines the required skills, behaviours and experience for the post, the safeguarding requirements for the role, the school's commitment to safeguarding and the post holder's responsibilities.
- An application form that collects personal details, full employment history, reasons for leaving, explanations for employment gaps, qualifications, reference contacts and a statement outlining suitability against the person specification.
- A shortlisting process involving at least two people, including checks for gaps, inconsistencies, safeguarding concerns and any information arising from online searches that should be explored at interview.
- References, including one from the current or most recent employer and, where possible, one from the most recent role involving work with children.
- An interview process which assesses safeguarding knowledge, professional boundaries, understanding of working with vulnerable children and suitability to work with children.
- Identity check, right to work in the UK, verification of qualifications, mental and physical fitness verification, prohibition checks where applicable, and any additional checks required for the role.
- Enhanced DBS check and children's barred list check where the role is in regulated activity, or where the individual starts in regulated activity before the DBS certificate is available.
- Checks for adults supervising children on work experience or in other settings where required by KCSIE and safer recruitment guidance.
- Appropriate checks and written assurances for agency staff, supply staff, contractors, volunteers, trustees, governors, visitors and adults working with pupils off-site, including overseas checks where relevant and confirmation of ongoing suitability.

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

The Trust will ensure that recruitment panels consider safeguarding throughout the process, including values, attitudes, professional boundaries, suitability to work with children, gaps in employment, concerns arising from references, online searches and any relevant self-disclosure. Any concern identified during recruitment must be explored, recorded and considered before appointment.

References must be scrutinised before appointment wherever possible and must be obtained directly from the referee. Open references or testimonials will not be accepted. Any discrepancy, vague wording, safeguarding concern, disciplinary history, unexplained gap, pattern of short employment or refusal to provide information must be followed up and recorded before an appointment decision is confirmed.

In line with KCSIE 2026 HR will conduct online searches for any shortlisted candidates; where possible HR will inform the candidate that this will be taking place prior to interview. Any relevant information will be shared with the recruiting manager to be explored at interview. Record of discussion to be recorded on interview template. Potential areas of concern (list not exhaustive):

- Discriminatory posts, language or sharing of discriminatory information
- Inappropriate images of children or vulnerable adults
- Posts or information shared of a violent and aggressive nature
- Content that may demonstrate that they pose a transferable risk or are inappropriate to work with children and vulnerable adults

All new members of staff will undergo an induction that includes familiarisation with the Trust's safeguarding and child protection policy and identification of their own safeguarding and child protection training needs. All staff will sign to confirm they have received and understood a copy of the Safeguarding policy.

Schools must maintain evidence that safer recruitment checks have been completed before appointment or engagement, including for agency and supply staff, contractors, volunteers, trustees and governors. Where written confirmation is obtained from an external organisation, the school must check and retain evidence that the relevant checks have been completed and that identity has been verified on arrival. Ongoing suitability must be monitored through induction, probation, supervision, line management, staff code of conduct expectations, low-level concern procedures and self-declaration requirements.

12.1 DBS Checks and London South East Education Group Roles

All staff hired by the Trust will complete a DBS renewal every three years which is to be recorded on the Single Central Record.

Staff who work in Group wide roles and working within the Trust are also required to have a DBS check every three years. This is to be recorded on the London South East College Single Central Record and confirmed with all Schools.

12.2 New Schools joining London South East Academies Trust

If a school transfers into the Trust that does not renew DBS' every three years they will be supported by HR to align to our DBS renewal process over two calendar years from the date of transfer. DBS renewals will be prioritised based on duration since last check, prioritising DBS' over five years, and for members of SLT (if applicable). It is the expectation that all members of staff will have a DBS that has been checked in under three years by the two-year anniversary of transfer into the Trust.

If members of staff move into a different position in the school/Trust, they will automatically have their DBS renewed as per usual processes.

If a school transfers into the Trust which already renews DBS' every three years this will continue post transfer with no changes required.

Safer Recruitment processes for staff transferring into the Trust is outlined in the Safer Recruitment Policy.

12.3 Single Central Record

The Single Central Record is maintained by each school and must include all elements outlined in KCSIE 2026, including staff, agency and supply staff, trainees, volunteers, trustees, governors and others as required. It is the responsibility of the Headteacher to ensure that the SCR is fully compliant. Senior leaders must audit the SCR at least once every half term, with evidence of checks, actions, resolution and reporting retained. The Trust will review SCR compliance through safeguarding reviews and may request evidence at any time.

13. Staff Training

All staff members will undertake safeguarding and child protection training at induction, including online safety, whistleblowing, low-level concerns, the staff code of conduct, the statutory Information Sharing Duty and the school's safeguarding systems. All staff, including those who do not work directly with children, must read Part One of Keeping Children Safe in Education 2026. Training and updates will cover relevance, necessity and proportionality; consent and transparency; the detriment exception; information about people connected to a child; secure sharing; recording decisions; and information sharing during transitions.

All staff training and annual safeguarding updates will include the relevant KCSIE 2026 themes, including early help and Family Help, professional curiosity, information sharing, mental health and suicide risk, children questioning their gender, misogyny and harmful sexual behaviour, child-on-child abuse, online safety, AI-generated content, deepfakes, self-

generated intimate images, serious violence, reasonable force, alternative provision, external use of premises, low-level concerns, allegations involving trainee teachers and safer recruitment.

14. Photography and images

Most people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place. To protect children, we will:

Seek the consent of both parents and children for photographs to be taken or published (for example, on our website or in newspapers or publications),

Use only the child's first name with an image,

- Ensure that children are appropriately dressed,
- Encourage children to tell us if they are worried about any photographs that are taken of them

15. External Agencies using School Premises

Where school premises are used by external organisations for non-school activities, including lettings, clubs, tuition, community activities, holiday provision, visitors or external speakers, the school will seek assurance that the organisation has appropriate safeguarding and child protection arrangements. This includes safer recruitment, DBS checks where applicable, supervision, Prevent duty considerations, visitor identification, risk assessment, reporting concerns, managing allegations, insurance and compliance with relevant statutory guidance. Any safeguarding concern connected to the use of school premises must be referred in line with local safeguarding procedures and reported to the DSL.

Lettings and hire agreements must make clear that the external organisation is responsible for its own safeguarding arrangements and must provide evidence of safeguarding policies, safer recruitment, DBS checks where applicable, supervision arrangements and reporting procedures. Where concerns arise, the school may terminate or suspend use of premises while safeguarding enquiries or risk assessments are completed.

External visitors and speakers must be appropriately risk assessed, supervised where required, and briefed on the school's safeguarding expectations. Schools must act promptly if visitor or speaker content, conduct or materials raise concerns about extremism, harassment, discrimination, harmful sexual behaviour, online harm, unsafe advice or any other safeguarding risk. See External Visitors Policy for full details.

16. Alternative Provision

If a school plans to commission a place using an alternative provider, the following must be in place:

The commissioning school remains responsible for safeguarding, attendance, progress and oversight of any pupil placed in alternative provision. A named school lead must oversee each placement and ensure that the placement is suitable, safe, lawful, appropriately registered where required, and able to meet the pupil's education, SEND, health and safeguarding needs.

- Obtain written safeguarding assurance from the alternative provider before placement, including confirmation of safer recruitment checks, DBS arrangements, staff suitability, safeguarding policies, attendance procedures, reporting routes and how the provider will inform the school of any safeguarding or staffing changes.
- Ensure the school always knows where the child is during school hours and has clear daily attendance, absence and welfare reporting arrangements.
- Share relevant safeguarding, SEND, medical, risk assessment and support information with the provider on a need-to-know basis so the placement can meet the child's needs safely.
- Review the placement at least half termly, or sooner if concerns arise, to confirm that the child is attending, safe, making progress and that the placement remains suitable.
- Take immediate action where safeguarding, attendance, behaviour, welfare or suitability concerns arise, including escalating to the DSL, reviewing the placement, involving parents or carers and local safeguarding partners where appropriate, and terminating the placement if risks cannot be satisfactorily addressed.
- Maintain a written placement plan which includes the purpose of the placement, expected outcomes, timetable, attendance reporting, named contacts, safeguarding arrangements, transport, reintegration planning, review dates and how the pupil's voice will be captured.

Schools should refer to the DfE guidance 'Alternative Provision' and 'Education for children with health needs who cannot attend school' for more information.

17. Complaints and Whistleblowing

Where there are concerns regarding safeguarding process and practice, Pupils and Staff are encouraged to make use of our internal systems to Whistle Blow (raise concerns) or highlight any issue in confidence. Staff are advised to review the Trust's Whistle Blowing policy.

Pupils are encouraged to speak to a trusted person in the school or directly to the Headteacher or a member of the Senior Leadership Team.

18. Monitoring and Evaluation

The effectiveness of the implementation of this policy will be reviewed through internal safeguarding audits conducted by the Trust and reported at the Group Safeguarding Steering Group. The Safeguarding Policy will be reviewed annually (as a minimum) and approved by the Trust Board.

Appendix One: School and Trust Responsibilities

Safeguarding Responsibilities and Accountabilities

Responsibility		
	School	**Trust**
Safeguarding Policy	Schools to add localised information to the template provided and add to school website by the 2nd of September 2026.	The Trust will provide by the 26th August 2026 a template which contains statutory information to all schools.
Safeguarding Information on Website	Localised information to be added to the Trust template by the 3rd of September and added to website.	
Safer Recruitment Checks	All safer recruitment checks to be completed by the school with HR support.	
Single Central Record	Single Central Record to be maintained by the school and HR to the standards outlined in KCSIE. Senior Leadership to audit the SCR at least once every half term.	Trust will audit the Single Central Record at the school's safeguarding review.
Concerns about a member of staff/referrals to the LADO	If there are concerns that a member of staff poses a risk to pupils, then the DSL and Head must decide whether to refer to the LADO (see local authority guidance on how to refer and thresholds). The LADO can be consulted for advice prior to referrals. If a referral is made to the LADO please ensure that HR and Trust Safeguarding Lead are notified.	Trust can be contacted for advice and guidance but the decision to refer sits within the school. Trust may attend LADO meetings to provide support and wider context regarding the Trust.
Induction of new staff	The implementation of Induction and Probationary processes sits within the school and supported by HR.	Trust will review induction processes and may make recommendations for standardisation or development.
Annual Refresher Training	DSLs to adapt template to add localised information. DSLs to deliver training to all staff at the beginning of the academic year and ensure that attendance is recorded on the SCR.	Trust will provide a template for the annual refresher training to schools by the 27th of August 2026.
DSL Team and Training	It is the responsibility of the Head to ensure that a DSL and a	Trust will provide recommendations for DSL

	DDSL is in place (as a minimum), and they are appropriately trained in line with KCSIE.	training and Trust will audit annually.
DSL Development and Support	Line management procedures to be in place to identify development needs and wellbeing support.	Trust will provide support to DSLs through half termly DSL Networks, regular safeguarding updates and additional supervision if required.
Safeguarding Supervision	DSLs and DDSls must have access to safeguarding supervision during the school day.	Trust will be providing guidance on the minimum requirements for supervision.
Staff and Pupils feel safe at school and know how to get support	Head has the responsibility to ensure that staff and pupils feel safe at school.	Trust can provide advice on how to measure and provide suggestions for improvements.
Safeguarding Themes in RSHE sessions	Curriculum planning and implementation responsibility sits within the school. Sessions should be reviewed through standard quality procedures.	Trust may provide additional resources and external support to develop curriculum and delivery if requested or identified as a requirement.
Reporting to Trust and Provision Boards	Heads will be contacted to provide information to feed into Governor/Trust reports.	Provision Boards: Trust will provide support to nominated DSLs to report to Provision Boards Trust Board and Committees: Trust will report on behalf of schools. Group Board and Committees: Trust will report on behalf of schools.

Accountability		
	Schools	**Trust**
Ofsted	Schools are accountable to Ofsted and need to ensure that safeguarding arrangements are effective.	Trust will provide support in preparing for inspections and will be available to support through inspection periods if required.
LADO	Schools are accountable to LADO processes and must follow threshold documents for local authority LADO.	Trust can support in preparing for LADO meetings and may attend the meetings if beneficial to the school, LADO or Trust. Trust is accountable to the LADO for Trust wide concerns.

Local Authority	School is accountable to respond to requests from the local authority including S175.	Trust is accountable for providing Trust wide information and reporting if required.
Governing and Corporation Boards	School is accountable to Trust to provide any required information for reporting.	Trust is accountable to Governance structures and will represent the schools. DSL representatives will be nominated to represent at Provision Boards.
London Southeast Education Group Executive		Trust is accountable to GEX to provide reassurance regarding effectiveness of safeguarding at schools.

Appendix Two Low Level Concerns Form

Low Level Concern Recording Form

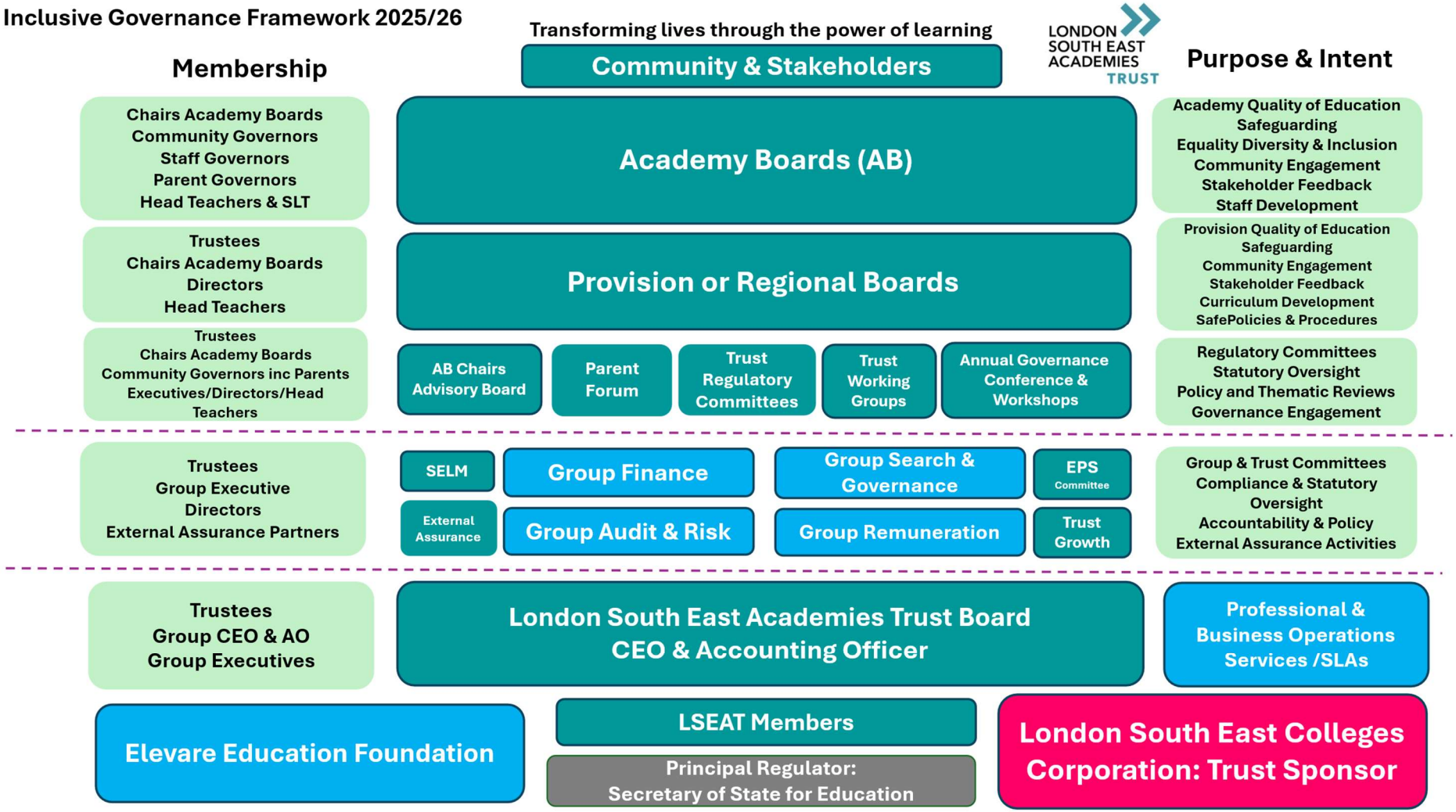
A low-level concern is any concern, no matter how small, that an adult may have acted in a way that:

- is inconsistent with LSEAT staff code of conduct, including inappropriate conduct outside of work, and/or
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO (but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary).

Your Name (optional)	
Your Role (optional)	
Date and Time completing the form	
Name of person(s) who the concern is about	
Details of your concern	Why does this behaviour/incident worry you? How many times has it happened? Has anyone else witnessed this? Does the behaviour breach staff code of conduct and how? Have you spoken to them about it? Date and times of concerns.

Completed by Head Teacher/ DSL

Name	
Role	
Consultation with LADO	Yes/No (rationale if No) Record summary of LADO conversation
Conversation with staff member	
Actions and Outcomes	


Inclusive Governance Framework 2025/26
Transforming lives through the power of learning
LONDON SOUTH EAST ACADEMIES TRUST
Membership
Community & Stakeholders
Purpose & Intent
Chairs Academy Boards
Community Governors
Staff Governors
Parent Governors
Head Teachers & SLT
Academy Boards (AB)
Academy Quality of Education
Safeguarding
Equality Diversity & Inclusion
Community Engagement
Stakeholder Feedback
Staff Development
Trustees
Chairs Academy Boards
Directors
Head Teachers
Provision or Regional Boards
Provision Quality of Education
Safeguarding
Community Engagement
Stakeholder Feedback
Curriculum Development
SafePolicies & Procedures
Trustees
Chairs Academy Boards
Community Governors inc Parents
Executives/Directors/Head Teachers
AB Chairs Advisory Board
Parent Forum
Trust Regulatory Committees
Trust Working Groups
Annual Governance Conference & Workshops
Regulatory Committees
Statutory Oversight
Policy and Thematic Reviews
Governance Engagement
Trustees
Group Executive
Directors
External Assurance Partners
SELM
Group Finance
Group Search & Governance
EPS Committee
External Assurance
Group Audit & Risk
Group Remuneration
Trust Growth
Group & Trust Committees
Compliance & Statutory Oversight
Accountability & Policy
External Assurance Activities
Trustees
Group CEO & AO
Group Executives
London South East Academies Trust Board
CEO & Accounting Officer
Professional & Business Operations Services /SLAs
Elevare Education Foundation
LSEAT Members
Principal Regulator:
Secretary of State for Education
London South East Colleges Corporation: Trust Sponsor

Safeguarding Policy Addendum: Medical Conditions and Allergies

Purpose

LSEAT recognises that safeguarding includes promoting the welfare, health and wellbeing of children and young people. Pupils with medical conditions, disabilities and allergies may be particularly vulnerable and may require additional support to ensure they can access education safely and participate fully in school life.

Working Together and Managing Information

LSEAT will work collaboratively with pupils, parents and carers, healthcare professionals and relevant staff to identify and manage medical and welfare needs. Appropriate information about medical conditions and allergies will be recorded, shared on a need-to-know basis and managed in accordance with data protection requirements, LSEAT's Allergy Policy and any individual healthcare or support plans.

Medical Needs and Safeguarding

Staff should be aware that medical needs and safeguarding can overlap. Concerns may arise where a pupil's medical condition or allergy is not being appropriately managed, essential medication is repeatedly unavailable, relevant medical information has not been provided, or a pupil's health needs place them at risk of harm, neglect, abuse or exploitation.

Any such concern must be reported to the Designated Safeguarding Lead (DSL) and managed in accordance with LSEAT's safeguarding procedures.

Support and Responsibilities

The school will implement reasonable and proportionate measures to support pupils with medical conditions and allergies. These may include:

- emergency response arrangements;
- appropriate staff awareness and training; and
- individual risk assessments where required.

Staff must follow LSEAT's Allergy Policy and any localised agreed healthcare or support plans to help ensure pupils remain safe and well supported.