Vantage Safeguarding & Child Protection Policy



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Responsibility	Jess Lane, Head of Safeguarding, Attendance, Behaviour and Culture (HSABC)
Approved by	Trustees

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Vantage CE Academies

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Document Providence

Effective from	**1 September 2026**
Date of Next Review	**September 2027, and on publication of any revised statutory guidance**
Version	**2**
Statutory basis	**Keeping Children Safe in Education 2026 (in force 1 September 2026); Working Together to Safeguard Children 2023**
Summary of changes	**Updated throughout to Keeping Children Safe in Education (KCSiE) 2026. Principal changes:** • Trust safeguarding leadership updated to the Head of Safeguarding, Attendance, Behaviour and Culture (HSABC); trust name updated to Vantage CE Academies Trust. • All staff, including those who do not work directly with children, must now read Part One of KCSiE in full (Annex A withdrawn; annexes renumbered). • New and expanded content on artificial intelligence, AI-generated and altered ("deepfake") images, and generative AI in education. • Filtering and monitoring effectiveness to be reviewed and recorded at least once every academic year; new mobile phone section reflecting mobile phone-free expectations. • Substantially updated mental health section, including emergency response expectations. • Expanded content on violence against women and girls, misogyny, serious violence and weapons. • Child-on-child abuse retitled and expanded; harmful sexual behaviour set out as a continuum. • Family Help terminology adopted in place of early help where appropriate. • Updated guidance on children who are LGB or who are questioning their gender. • Safer recruitment updated for the removal of the supervision exemption from regulated activity (Crime and Policing Act 2026) and the Data (Use and Access) Act 2025. • New sections on young carers, pupils with medical conditions, sport and physical activity, and use of reasonable force. • Typographical and referencing corrections throughout.
Related Policies and Documents	• Children Missing Education Policy • Child Sexual Exploitation (CSE) Policy • Prevent Duty Policy • Child-on-child Abuse Policy/Anti-Bullying Policy

	• Behaviour/Exclusion Policy • Online Safety Policy (including filtering and monitoring) • Mobile Phone Policy • Staff Behaviour/Code of Conduct Policy • Social Media Policy • Use of School Devices Policy • Artificial Intelligence (AI) Acceptable Use Guidance • CPOMS Policy and CPOMS Handbook • School Trips and Visits Policy • Safer Recruitment Policy • Looked After Children's Policy • Whistleblowing Policy • Allegations of Abuse Against Staff Policy • Low-Level Concerns Policy • Photography Policy • Attendance Policy • Home Visits Policy • Data Protection Policy • Supporting Pupils with Medical Conditions Policy • Mental Health and Wellbeing Policy • Use of Reasonable Force and Restrictive Intervention Policy • Lockdown / Critical Incident Policy • Trust Safeguarding Supervision Policy

Policy History

Version	Date	Reviewed by	Approved
1	3 July 2025	Rhian Williams	Board of Trustees, 3 July 2025
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1. Policy Statement

Vantage CE Academies Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of our schools' premises, including online. We implement a trust-wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken and that healthy, respectful relationships are promoted. The Trust is committed to a zero-tolerance approach to sexual harassment and sexual violence, and to sexism, misogyny, racism and all other forms of prejudice or derogatory behaviour.

This policy outlines a clear framework relating to all aspects of safeguarding within the Trust and should be followed by:

- All members of staff, including trainee teachers, supply staff, contractors and volunteers
- Every school within the Trust
- All Local Advisory Boards (LABs) and committees of the Trust
- Individual trustees and the Board of Trustees
- The Trust as a whole, including central team staff
- Any associate members of the Board of Trustees and/or its committees

This policy sets out a clear and consistent framework for delivering this commitment, in line with safeguarding legislation and statutory guidance, principally Keeping Children Safe in Education 2026 (KCSiE) and Working Together to Safeguard Children 2023. It will be achieved by:

- Ensuring that trustees, governors, Principals and all staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and neglect, and know to refer concerns to an appropriately trained person, i.e. the Designated Safeguarding Lead (DSL) or a Deputy DSL (DDSL) within their school.
- Ensuring that all staff, including those who do not work directly with children, read and understand Part One of KCSiE in full.
- Ensuring pupils are taught how to keep themselves safe, including online, and how to recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil who has been subject to, or is at risk of, abuse, neglect or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that Principals and any new staff, trainees and volunteers within the Trust are only appointed or engaged once all the appropriate checks have been satisfactorily completed.

2. Good Safeguarding Practice

The following key features help schools promote and maintain a safer culture that protects and promotes the welfare of children, young people and vulnerable adults:

- A leadership commitment, at all levels, to the importance of safeguarding and promoting the welfare of children, young people and vulnerable adults, led at a strategic level by the Board of Trustees and the HSABC.
- A clear line of accountability for all safeguarding work with clarity of roles and responsibilities.
- Clear reporting procedures to deal with safeguarding concerns and allegations.
- Practice and services informed by ongoing learning, review, and the active involvement of pupil voice and parent participation.
- Safer recruitment procedures in place.

- Clear arrangements for support and professional supervision.
- Comprehensive safeguarding training for all staff and volunteers working with or in contact with children, young people and their families.
- Effective working with statutory and voluntary sector partners.
- Complaints and whistleblowing procedures that are well publicised.
- Effective information sharing.
- Good record keeping.
- Regular training and/or updates.
- Induction of new staff.

3. Acronyms

This policy contains a number of acronyms used in the education sector. These are listed below alongside their descriptions.

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems able to generate content or perform tasks that would normally require human intelligence. Includes generative AI tools that can create text, images, audio and video.
CCE	Child criminal exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CME	Child missing from education	Where the school does not know the whereabouts of a child who is missing from school.
CPOMS	Child Protection Online Management System	The electronic platform used by Trust schools to record safeguarding concerns, observations, decisions and actions in line with this policy.
CSC	Children's Social Care	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual 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.
DBS	Disclosure and Barring Service	The service that performs statutory checks of criminal records for people who wish to work with children and vulnerable adults, either through paid employment or on a voluntary basis.
DfE	Department for Education	The national government department with responsibility for children's services, policy and education in England.

Acronym	Long form	Description
DPO	Data Protection Officer	The appointed person in a school or trust with responsibility for overseeing the responsible use of data within the organisation and ensuring data is handled in line with data protection law.
DSL	Designated Safeguarding Lead	The member of the senior leadership team who takes lead responsibility for safeguarding and child protection in a school.
DDSL	Deputy Designated Safeguarding Lead	A deputy who is trained to the same standard as the DSL and can make decisions regarding child protection cases within a school in the absence of the DSL.
EEA	European Economic Area	The Member States of the European Union and Iceland, Liechtenstein and Norway (excluding Switzerland).
EHCP	Education, Health and Care Plan	A funded plan which coordinates the educational, health and social needs of pupils who have significant needs that impact on their learning and access to education.
EHA	Early Help Assessment	A tool that helps to identify and address the needs of children and their families. A lead practitioner works with the child and their parent or carer, with their consent, to gather and analyse information and agree a family plan. Under Working Together 2023 and KCSiE 2026, targeted early help forms part of local Family Help arrangements.
ESFA	Education and Skills Funding Agency	The DfE agency with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	A procedure where the female genital organs are injured or changed for no medical reason. FGM is illegal and is a form of child abuse.
HBA	Honour-based abuse	Incidents or crimes committed to protect or defend the perceived honour of the family and/or community, including FGM, forced marriage, virginity testing and practices such as breast ironing.
HMCTS	HM Courts and Tribunals Service	The executive agency responsible for the administration of criminal, civil and family courts and tribunals in England and Wales.
HSABC	Head of Safeguarding, Attendance, Behaviour and Culture	The Trust's senior safeguarding lead, responsible for strategic leadership, quality assurance, supervision and support for safeguarding across all Trust schools. Referred to in previous versions of this policy as the Trust Safeguarding Lead.
HSB	Harmful sexual behaviour	Sexual behaviour by children that is developmentally inappropriate, may be harmful towards self or others, or is abusive towards another child, young person or adult. HSB sits on a continuum from problematic behaviour through to sexual violence.

Acronym	Long form	Description
ITT	Initial teacher training	A programme of training to achieve qualified teacher status. Trainee teachers on placement in Trust schools are subject to this policy.
KCSiE	Keeping Children Safe in Education	Statutory guidance setting out schools' and colleges' responsibilities to safeguard and promote the welfare of children. This policy refers to KCSiE 2026, in force from 1 September 2026. Any subsequent update will be duly amended and referenced. Throughout this policy, KCSiE 2026 is referred to as KCSiE.
LA	Local authority	A local government body responsible for the provision of a range of local services, including education and children's social care.
LAB	Local Advisory Board	The local governing body of a Trust school.
CLA/LAC	Children looked after / Looked after children	Children who are in the care of the local authority, either in residential care or a foster placement, for a period of longer than 24 hours.
LADO	Local Authority Designated Officer	The designated person employed by the LA to respond to allegations of abuse against adults who work with children. The LADO coordinates the response and works with the employer, the police and other agencies to ensure a fair and thorough investigation.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer	A term relating to a community of people who share protected characteristics under the Equality Act 2010. KCSiE uses the terms LGB and gender-questioning.
MAT	Multi-academy trust	An educational trust set up to provide support and collaboration across a number of schools.
NRM	National Referral Mechanism	The framework for identifying and referring potential victims of modern slavery to ensure they receive the appropriate support.
NPCC	National Police Chiefs' Council	The national coordination body for law enforcement in the UK and the representative body for British police chief officers.
PLAC	Previously looked after children	Children who have been in the care of the LA but ceased to be because they were adopted, or became subject to a child arrangements order or a special guardianship order.
PSHE	Personal, social, health and economic education	A subject which forms part of the personal development curriculum and allows pupils to learn about themselves, other people, rights, responsibilities and relationships.
QTS	Qualified teacher status	A requirement in England to work as a teacher in a state or special school.
RSHE	Relationships, sex and health education	A statutory component of the curriculum that teaches pupils about different relationships, consent, the

Acronym	Long form	Description
		promotion of healthy relationships, and physical and mental health, in an age-appropriate way.
SCR	Single central record	A statutory secure record of all employees, volunteers and regular visitors to the school which evidences that checks have been completed to ascertain their suitability to work with children.
SENCO	Special educational needs coordinator	A statutory role within schools maintaining oversight of and coordinating the school's special educational needs policy and provision.
SEND	Special educational needs and disabilities	A term describing pupils who have specific needs which may be a barrier to their learning.
SLT	Senior leadership team	Senior members of school staff responsible for strategic decision making, with responsibilities for specific areas within the school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VAWG	Violence against women and girls	Acts of violence, abuse or harassment that disproportionately affect women and girls, including sexual violence, sexual harassment, domestic abuse, HBA and online abuse. Tackling VAWG, including the misogynistic attitudes that underpin it, is a national priority reflected in KCSiE.
VSH	Virtual School Head	The named person within the LA with responsibility for promoting the education and welfare of looked after children, previously looked after children, children with a social worker and, on a non-statutory basis, children in kinship care.

4. Definitions

The terms **children** and **child** refer to anyone under the age of 18. Safeguarding and promoting the welfare of children is defined, in line with Working Together to Safeguard Children 2023, as:

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

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and have the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16. However, it is an offence to make, possess or share indecent images of anyone under 18.

Sexual violence refers to the following offences as defined under the Sexual Offences Act 2003:

Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.

Assault by penetration: A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

Sexual assault: A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

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

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting, including misogynistic or sexist remarks.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern, including: the consensual and non-consensual sharing of nude and semi-nude images and/or videos (including images that are digitally altered or wholly generated using AI); sharing unwanted explicit content; upskirting; sexualised online bullying; unwanted sexual comments and messages, including on social media; and sexual exploitation, coercion and threats.

Upskirting refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

Indecent and semi-indecent images (also known as nudes and semi-nudes, colloquially "sexting" or youth-produced sexual imagery) are images or videos of a child that are nude or semi-nude, or that depict a child in a sexual way. KCSiE makes clear that such images may be digitally altered or wholly generated using artificial intelligence, including so-called "deepfakes", and that these are treated in exactly the same way as images of a real event. For the purposes of this policy, indecent imagery includes any image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing.
- A child touching themselves in a sexual way.
- Any sexual activity involving a child.
- Someone hurting a child sexually.
- Sexual activity that involves animals.

- Any of the above where the image has been created, altered or generated using AI or editing tools so that it appears to depict a child.

Abuse is a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others; this can be particularly relevant in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them, or "making fun" of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images (including AI-generated images), encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age, including other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect can occur in any family regardless of income or social status.

Legal Framework

This policy has due regard to all relevant legislation and statutory guidance, including but not limited to the following:

Legislation

- Children Act 1989 and Children Act 2004
- Education Act 2002 (section 175) and Education Act 2011
- Safeguarding Vulnerable Groups Act 2006

- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 and Serious Crime Act 2015
- Apprenticeships, Skills, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Health and Care Act 2022
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Online Safety Act 2023
- UK General Data Protection Regulation, Data Protection Act 2018 and Data (Use and Access) Act 2025
- Crime and Policing Act 2026 (including the amended definition of regulated activity)
- Children's Wellbeing and Schools legislation, as its provisions are brought into force

Statutory guidance

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2023
- Working Together to Improve School Attendance (statutory from August 2024)
- Prevent Duty Guidance; Channel Duty Guidance
- Multi-agency statutory guidance on female genital mutilation
- HM Government multi-agency practice guidelines: handling cases of forced marriage
- Disqualification under the Childcare Act 2006
- Alternative Provision statutory guidance
- Supporting pupils with medical conditions at school
- Relationships Education, Relationships and Sex Education and Health Education statutory guidance

Non-statutory guidance

- Child abuse concerns: guide for practitioners
- Information sharing advice for safeguarding practitioners
- Child sexual exploitation: definition and guide for practitioners; Child exploitation disruption toolkit
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS)
- Generative artificial intelligence in education (DfE)
- Meeting digital and technology standards in schools and colleges: filtering and monitoring standards
- Mobile phones in schools (DfE)
- Gender questioning children: guidance for schools and colleges (DfE)
- Use of reasonable force and restrictive practices in schools (DfE)
- Keeping children safe in out-of-school settings

- Promoting and supporting mental health and wellbeing in schools and colleges; Mental health and behaviour in schools
- Support for pupils where a mental health issue is affecting attendance
- Virginity testing and hymenoplasty: multi-agency guidance
- Recruit teachers from overseas; Employer's guide to right to work checks
- Data protection in schools (DfE)

Policies and documents

This policy operates in conjunction with the Trust and school policies listed in the Document Providence table at the front of this policy.

5. Roles and Responsibilities

The Board of Trustees

The Board of Trustees has ultimate responsibility for ensuring that the Trust and each of its schools comply with their safeguarding duties under legislation and statutory guidance. The Board ensures that safeguarding is led at a strategic level, that this policy is in place and reviewed at least annually, that all staff read Part One of KCSiE in full, that filtering and monitoring arrangements are reviewed and recorded at least once every academic year, and that safer recruitment practice is embedded across the Trust. A named trustee holds the safeguarding portfolio and receives termly reports from the HSABC.

Head of Safeguarding, Attendance, Behaviour and Culture (HSABC)

The HSABC is the Trust's senior safeguarding lead and provides the strategic umbrella for safeguarding across the Trust throughout the year. The HSABC works closely with all school DSLs, who hold responsibility for safeguarding and line manage the DDSLs in their schools. The HSABC:

- Provides professional safeguarding supervision to DSLs in line with the Trust Safeguarding Supervision Policy, both 1:1 and through regular peer DSL networks.
- Provides complex case management support and general safeguarding advice and guidance to DSLs and Principals.
- Quality assures safeguarding practice, CPOMS recording and the SCR across Trust schools, and reports the Trust-wide safeguarding picture to the Board of Trustees.
- Must be informed of all allegations against staff and any referral to the LADO.
- Coordinates Trust-wide safeguarding training, policy updates and the annual implementation of revised statutory guidance.

Where this policy refers to the HSABC, this includes any officer to whom the HSABC has delegated a function, and any senior Trust officer covering the role in their absence.

Designated Safeguarding Lead (DSL)

The DSL is a member of the school's senior leadership team and takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. Annex B of KCSiE sets out the full description of the DSL's responsibilities. In the absence of the DSL, a Deputy DSL will provide appropriate cover. All deputies are trained to the same standard as the DSL and the role is explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL and is not delegated. Appendix 5 sets out the current details of all Trust DSLs. The DSL or a DDSL will be available during school hours for staff to discuss any safeguarding concerns. 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, Family Help services, the Channel programme, the DBS and/or the police).
- Support staff who make such referrals directly.
- Maintain meticulous records on CPOMS, track trends, report the safeguarding picture to key stakeholders and drive a climate of continuous improvement.
- Manage the safeguarding training process for staff, ensuring that all school staff, trainees, volunteers and governors receive regular and appropriate safeguarding training and read Part One of KCSiE in full.

Where the DSL is not the Principal, the DSL will keep the Principal informed of any issues and liaise with LA case managers and designated officers for child protection concerns as appropriate.

DSL support and supervision

The DSL will receive professional safeguarding supervision from the HSABC in line with the Trust Safeguarding Supervision Policy and Working Together to Safeguard Children recommendations. Supervision will be both 1:1 and within regular peer DSL networks facilitated by the HSABC.

Safeguarding and governors

The Local Advisory Board (LAB) has strategic leadership responsibility for the school's safeguarding arrangements and must ensure that the school complies with its duties under legislation. The LAB ensures that the school adopts a whole-school approach to safeguarding. In addition:

- There will be a safeguarding update within each Principal's report.
- The DSL will provide an update for governors at relevant meetings.
- The LAB undertakes an annual review of the Safeguarding and Child Protection Policy.
- The Chair of Governors will immediately liaise with the LADO regarding any allegation made against the Principal.
- The LAB supports the Trust safer recruitment policy.
- All governors will read updated legislation and guidance, including KCSiE, and complete appropriate safeguarding training.
- The LAB makes every effort to ensure the child's wishes and feelings are considered when determining what action to take and which services to provide, through effective quality assurance and challenge.

Lead Governor for Safeguarding

All Trust schools have a Lead Governor for Safeguarding (LGS) who has received appropriate safeguarding and child protection training for governors. The LGS will ensure that every member of the LAB who sits on interview panels has completed safer recruitment training. The LGS works closely with the Principal and DSL to promote safeguarding. The role includes the following duties:

- Together with the Principal and DSL, undertaking an annual review of the school's safeguarding and child protection procedures and of the efficiency with which the related duties have been discharged.
- Working with the DSL on safeguarding policies to be presented to the LAB.
- Working with the DSL and the responsible member of SLT to ensure that appropriate filtering and monitoring systems are in place, that their effectiveness is reviewed and recorded at

least once every academic year, and that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.

- Ensuring the SCR is checked at least termly and any issues are addressed promptly.
- Ensuring the DSL has the time and resources to carry out the duties of their role.
- Together with the LAB, approving amendments to safeguarding and child protection arrangements in the light of changing regulations or recommended best practice at least annually.
- Meeting with the DSL regularly to discuss safeguarding matters.

The role of the Principal

The Principal has overall responsibility for all safeguarding concerns involving the school (including historic concerns). Key responsibilities include:

- Appointing the DSL and ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Overseeing the communication with the LADO relating to any allegation made against any member of staff or volunteer (including supply, agency and trainee staff) in accordance with LA and school procedures, and acting as case manager in the event of an allegation, where appropriate.
- Liaising with the LADO and other relevant safeguarding partners with regard to any historic safeguarding concerns.
- Ensuring, via the DSL, that all staff and volunteers have received appropriate safeguarding training, that this training is up to date and that a record is kept.
- Together with the DSL, appropriately supporting all children and staff when abuse occurs or allegations of abuse are made.
- Ensuring the school operates as a mobile phone-free environment for pupils in line with DfE guidance and the school's mobile phone policy.
- Ensuring the relevant staffing ratios are met and that each child in the EYFS is assigned a key person, where applicable.

Senior leader responsible for filtering and monitoring

Each school will identify a member of the senior leadership team who is responsible for filtering and monitoring. That leader, supported by the DSL and IT staff or providers, leads the annual review of filtering and monitoring effectiveness, ensures roles and responsibilities are assigned, and reports the outcome to the LGS and the HSABC.

Designated Teacher

The designated teacher has responsibility for promoting the educational achievement of children looked after, previously looked after children, any child with a social worker, and children who have left care through adoption, special guardianship or child arrangements orders, or who were adopted from state care outside England and Wales. Further information regarding the role can be found in the Looked After Children's Policy.

All staff

Safeguarding is a fundamental part of every person's role within school. Staff will promptly report safeguarding concerns in line with school procedures and ensure policies and guidance are followed as directed by the DSL. Staff will:

- Read and understand Part One of KCSiE in full, this policy, the staff code of conduct, the behaviour policy, the online safety policy, the child-on-child abuse policy and the school's response to children absent from education, and seek clarification as required.

- Ensure they listen to the pupil and report concerns accurately, always following the school safeguarding procedures and recording on CPOMS.
- Actively participate in regular safeguarding training and safeguarding updates.
- Understand their role in relation to filtering and monitoring and be able to name the systems in use.
- Report concerns about members of staff, including low-level concerns, in line with school procedures.
- Work within a culture of vigilance and adopt a mindset of "it could happen here".

6. Multi-Agency Working

Vantage CE Academies Trust contributes to multi-agency working as part of its statutory duty. Each school will follow the local safeguarding arrangements within its LA and will be fully engaged, involved and included in those arrangements. The Trust follows its statutory duty to cooperate with LA published arrangements in the same way as other relevant agencies, and works with CSC, the police, health services and other services to protect the welfare of its pupils, through Family Help and early help processes and by contributing to multi-agency plans to provide additional support.

Where a need for help is identified, the Trust will support the CSC within the relevant LA to conduct (or consider whether to conduct) a Section 17 assessment or a Section 47 Enquiry under the Children Act 1989. A Section 17 assessment gathers information about all children living in a household and their family to assess need and risk. A Section 47 Enquiry (also referred to as a Child Protection Enquiry) is carried out to assess whether there is a risk of significant harm to the child. The Trust also recognises the particular importance of inter-agency working in identifying and preventing exploitation. The Trust will reflect the DfE's expectations to secure strong multi-agency working by:

- Collaborating with services to achieve shared goals and share information.
- Learning from evidence and sharing perspectives to evaluate provision.
- Prioritising and sharing resources depending on pupils' needs.
- Celebrating inclusivity and diversity and challenging discrimination.
- Mutually and constructively challenging others' assumptions in a respectful manner.

7. Information Sharing

Vantage CE Academies Trust recognises the importance of proactive information sharing between professionals and local agencies to effectively meet pupils' needs and identify any need for help. Staff will be aware that whilst the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 place a duty on schools to process personal information fairly and lawfully, they also allow information to be stored and shared for safeguarding purposes. Data protection law does not act as a barrier to sharing information where failure to do so would result in a pupil being placed at risk of harm. Staff will ensure that fear of sharing information does not override their responsibility to promote the welfare and safety of pupils. If staff are in doubt about sharing information, they will speak to the DSL or a DDSL. Staff, governors and trustees are directed to the DfE data protection guidance for schools.

8. Early Help and Family Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Working Together to Safeguard Children 2023 and KCSiE 2026 describe a continuum of support running from universal services and community-based early help, through the targeted early help

level of Family Help, to statutory intervention where a child is in need or at risk of significant harm. Trust schools will use the terminology and referral routes of the local Family Help arrangements in each of their LAs.

Any pupil may benefit from early help, although staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHCP.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or go missing from education, home or care.
- Have experienced multiple suspensions, are at risk of being permanently excluded, or are in alternative provision or a Pupil Referral Unit.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have a parent or carer in custody or are affected by parental offending.
- Are in family circumstances presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues or domestic abuse.
- Misuse drugs or alcohol.
- Are at risk of honour-based abuse such as FGM or forced marriage.
- Are privately fostered.
- Are persistently or severely absent from school.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local Family Help process will be followed as required. Staff may be required to support other agencies and professionals in an assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

9. Categories of Abuse

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, school or community setting by those known to them or by others (e.g. via the internet). They may be abused by an adult or adults, or by another child or children. Abuse is categorised as physical abuse, emotional abuse, sexual abuse and neglect, as defined in Section 4 of this policy.

Included within the four categories of abuse and neglect are a number of factors relating to the behaviour of parents and carers which have a significant impact on children, such as domestic abuse. Research analysing serious case reviews has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject to statutory child protection plans. Children can be affected by seeing, hearing and living with domestic abuse, as well as by being caught up in incidents directly, whether to protect someone or as a target. Children aged 16 and 17 are increasingly affected by domestic abuse in their own peer relationships.

Staff will also be aware that harms frequently overlap, and that a child experiencing one form of abuse or exploitation is often at heightened risk of others. Staff should consider the whole picture of

a child's circumstances and report all concerns, however minor they appear in isolation, so that the DSL can identify patterns.

10. Specific Safeguarding Issues

There are certain specific safeguarding issues that can put children at risk of harm. Staff will be made aware of these issues, which form the basis of regular refresher training. Appendix 2 sets out details of specific safeguarding issues that pupils may experience and outlines the actions that will be taken in relation to each.

11. Child-on-Child Abuse (including harassment and violence)

KCSiE defines child-on-child abuse as abuse between children. The Trust has a zero-tolerance approach to abuse, including child-on-child abuse. All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it and how to respond to reports. All staff will recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring; schools must assume it is happening and ensure pupils know how to report it.

KCSiE 2026 makes clear that child-on-child abuse is a safeguarding issue for both the child who has been harmed and the child alleged to have caused harm, and that both are entitled to support. All staff will speak to the DSL if they have any concerns about child-on-child abuse. All staff will understand the importance of challenging inappropriate behaviour between pupils and will not tolerate abuse as "banter", "just having a laugh" or "part of growing up". Child-on-child abuse can be manifested in many ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers, sometimes known as "teenage relationship abuse".
- Physical abuse, which may include an online element which facilitates, threatens and/or encourages physical abuse or bystanding.
- Sexual violence, which may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Sexist and misogynistic behaviour, comments and "jokes", and the sharing of misogynistic content.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos, including AI-generated or altered images.
- Upskirting.
- Initiation and hazing-type violence and rituals.
- Bystanding, where a pupil does not take part but shows the perpetrator support by being present.
- Cyberbullying, including name-calling on social media, creating groups where abuse takes place, sharing material about someone without their consent, creating videos, memes or AI-generated content about someone, and using platforms to exclude or talk about someone in their absence.
- Exclusion, where someone is deliberately excluded or ostracised from a group.
- Racially or religiously motivated abuse, and abuse targeting any protected characteristic.

All staff will be fully conversant with the school's policy and procedures in respect of child-on-child abuse and their role in preventing it and responding where they consider a child might be at risk. Pupils will be empowered to raise concerns or make a report, and will be reassured that they will be taken seriously, supported and kept safe. Schools will maintain accurate records of child-on-child abuse on CPOMS that enable statistical analysis against protected characteristics, including sex. The school's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse/Anti-Bullying Policy. Staff will follow these procedures, in addition to the procedures outlined in the Behaviour and Suspension and Exclusion policies, where appropriate.

Preventative education

Preventative education is the most effective way of tackling child-on-child abuse. Trust schools will deliver a planned, age-appropriate RSHE and PSHE curriculum that addresses consent, healthy relationships, respect, online safety, misogyny and sexism, and the harms of pornography and sexual imagery. Schools will actively promote a culture in which sexism, misogyny, misandry, homophobia, racism and all other forms of prejudice are challenged, and in which pupils are confident that reports will be acted upon.

12. Harmful Sexual Behaviour, Sexual Violence and Sexual Harassment

Children who display harmful sexual behaviour and children affected by it

It is crucial that everyone within school recognises that harmful sexual behaviour (HSB) happens in schools and adopts the view that "it could happen here". KCSiE 2026 describes HSB as a continuum: from behaviour that is developmentally inappropriate or problematic, through sexual harassment, to sexual violence. Recognising and responding to behaviour at the lower end of the continuum is essential to preventing escalation. Safeguarding training will be provided for all members of the school community to promote a diligent safeguarding culture in which such situations receive a swift, proportionate and timely response that meets the needs of all affected.

There are many ways to describe children who have been subjected to sexual violence and/or sexual harassment, and those alleged to have caused harm. Not everyone who has been subjected to sexual violence or harassment considers themselves a "victim" or would want to be described in that way. Staff will be conscious of this and be prepared to use the term with which the individual child is most comfortable. Any child displaying harmful behaviour is entitled to, deserving of, and should be provided with, a different level of support to that which might be provided to an adult alleged to have abused a child.

Responsibilities

Trust schools are required by law to have a behaviour policy and measures in place to prevent all forms of bullying, and to provide relationships education. Our schools play an important role in preventative education. Good practice allows children an open forum to talk things through, and all staff should know how to support children and how to manage a disclosure. Schools will have in place a meaningful and expert-led RSHE curriculum which allows for open and honest discussion about relationships, consent and respect.

Responding

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Some situations are clear:

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.

- Creating and sharing sexual photos and videos of under-18s is illegal, including where a child creates and shares images of themselves, and including images that are AI-generated or digitally altered.

Schools are not alone in dealing with sexual violence and sexual harassment; statutory partners such as CSC and the police may need to become involved. Issues are likely to extend beyond school, and online issues and social media can extend the impact of the abuse. School leaders have a duty to respond to all incidents they are made aware of, including those occurring on transport or outside school, and whether or not the child has reported directly. It is essential that children are reassured that they are being taken seriously and will be supported and kept safe. A child who has been affected by abuse should never be given the impression that they are creating a problem, nor be made to feel ashamed for making a report.

Practitioners should:

- Not promise confidentiality.
- Inform the child of the next steps.
- Be supportive, respectful and non-judgemental, and listen to what the child is saying.
- Never ask leading questions; use open questioning.
- Record the disclosure on CPOMS, using the exact words the child spoke, recording only the facts as the child presents them and labelling any opinion clearly.
- Inform the DSL immediately.

When to inform the child who is the subject of an allegation is a decision that should be carefully considered. Where a report is going to be made to CSC and/or the police, the DSL should speak to the relevant agency and discuss next steps, including how and when the child who is the subject of the allegation will be informed. The DSL should consider the following:

- Parents or carers should normally be informed, unless this would put a child at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to CSC.
- Rape, assault by penetration and sexual assaults are crimes and must be reported to the police. If the DSL is not available, it is the responsibility of school staff to contact the police and CSC. Leaving school without sharing information is not an option.

Where there has been a report of sexual violence, the DSL should make an immediate risk assessment which considers the child who has been affected, the child who has displayed the behaviour, other children (and sometimes staff), lessons where both parties are together, transport to and from school, and risks that may occur outside of lessons and outside of school. Risk assessments will be recorded on CPOMS and kept under review with a date identified for review. Key staff should be mindful of any police bail conditions but should act independently; the lapsing of bail conditions is not an automatic indication that risk has decreased. Further information on managing incidents of sexual violence and sexual harassment is set out in Part Five of KCSiE.

Supporting young people through criminal cases

Where an allegation is progressing through the criminal justice system, school leaders should be aware of anonymity, witness support and the criminal process so they can offer support and act appropriately. An "appropriate adult" is required to support the child during any formal statutory interview. School leaders should do all they reasonably can to protect the anonymity of any child involved, carefully considering which staff need to know about the report and what support will be in place, and considering the potential impact of social media in spreading rumours and exposing identities.

Thresholds

In some cases of sexual harassment, for example one-off incidents, school leaders may take the view that the children concerned are not in need of statutory intervention and that it is appropriate to handle the incident internally, through the behaviour and anti-bullying policies and by providing pastoral support. Advice should be sought in these situations from the HSABC. All concerns, discussions, decisions and reasons for decisions will be recorded on CPOMS and discussed with the DSL. School leaders may decide that the children involved may benefit from an early help or Family Help assessment.

Where a child has been harmed, is at risk of harm, or is in immediate danger, school leaders, via the DSL, should make a referral to local CSC. Where CSC decides a statutory intervention is not appropriate, the DSL should be prepared to refer again if they believe the child remains at risk. If a satisfactory response is not received, the HSABC will intervene to offer support and, where necessary, use the LA escalation procedure. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this must be passed on to the police. If a child is convicted or receives a caution for a sexual offence, school leaders should update the risk assessment, ensure relevant protections are in place for all children, and consider any suitable action in light of the behaviour policy. Where the child accused remains in the same school, school leaders should be very clear about their expectations of that child, including any reasonable and proportionate restrictions on their timetable.

Ongoing responses

Staff should consider the age and developmental stage of the child affected, the nature of the allegations and the potential risk of further abuse. By the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the parties. Support should be proportionate and tailored on a case-by-case basis. Children who have been affected may not disclose the whole picture immediately and may be more comfortable providing information piecemeal; dialogue must be kept open and encouraged. When ongoing support is required, staff should ask the child whether they would find it helpful to have a designated trusted adult to talk to. The choice of that adult should be the child's. If required, school staff should provide a physical space for the child to withdraw and additional time to facilitate meetings.

Harmful sexual behaviour between children can have a wider impact. The person receiving the information may have experienced trauma in the past and could be affected by dealing with the situation. Pastoral support and/or counselling should be considered for any staff involved as part of the risk assessment process, recognising the duty of care owed to staff and volunteers.

13. Online Safety, Filtering and Monitoring, Mobile Phones and AI

Each school must have an Online Safety Policy and adhere to it at all times. As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content**: being exposed to illegal, inappropriate or harmful content, for example pornography, fake news, misinformation, disinformation and conspiracy theories, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism, and content generated or amplified by AI.
- **Contact**: being subjected to harmful online interaction with other users, for example peer-to-peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.
- **Conduct**: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (including consensual and non-consensual

sharing of nudes and semi-nudes, and AI-generated or altered images), sharing other explicit images, and online bullying.

- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and financial scams.

Through training, all staff will be made aware of pupil attitudes and behaviours which may indicate they are at risk of potential harm online, the procedure to follow when they have a concern regarding a pupil's online behaviour, and the procedures to follow if a pupil attempts to access content on school devices which is known to be blocked or is flagged by the filtering and monitoring systems.

Filtering and monitoring

Each school will ensure that appropriate filtering and monitoring systems are in place on all internet-connected devices and networks used by pupils and staff, in all relevant locations, to prevent children accessing inappropriate material and to identify concerns. Filtering means that systems block inappropriate content from being accessed; monitoring flags when a pupil attempts to access content that has been blocked or that indicates a safeguarding risk. Schools must have both systems in place and will meet the DfE filtering and monitoring standards. Schools will ensure that systems do not over-block in a way that causes unreasonable restrictions on teaching and learning.

KCSiE 2026 requires that the effectiveness of filtering and monitoring systems is reviewed at least once every academic year. In Trust schools this review will be led by the senior leader responsible for filtering and monitoring, supported by the DSL and IT staff or providers, and will check that filtering operates on all internet-connected devices in all relevant locations, that monitoring alerts are received and actioned by an identified person, and that any gaps are remedied. A written record of each review, its findings and actions will be kept and reported to the LGS and the HSABC. Systems will also be reviewed following any serious breach, a change of provider, or a significant change in the school's technology.

All staff should be clear on their roles and responsibilities in relation to filtering and monitoring, which form part of safeguarding training. Staff must be able to name the systems used by their school to filter and monitor content, and must report safeguarding concerns if:

- They witness or suspect that unsuitable material has been accessed.
- Pupils are able to access unsuitable material.
- They are teaching topics that could create unusual activity on the filtering logs.
- There is a failure in the software or abuse of the system.
- There are perceived unreasonable restrictions that affect teaching and learning or administrative tasks.
- They notice abbreviations, misspellings or workarounds (including the use of AI tools or VPNs) that allow access to restricted materials.

Artificial intelligence

AI, and generative AI in particular, offers opportunities for education but also presents risks. Staff and pupils in Trust schools may use only AI tools that have been approved by the Trust, in line with the DfE guidance Generative artificial intelligence in education and the Trust's AI acceptable use guidance. Staff must not enter personal or sensitive data about pupils, families or staff into AI tools that have not been approved for that purpose. Pupils will be taught about the risks of AI, including AI-generated misinformation, AI chatbots and companions, and the creation of AI-generated or altered images. Staff will be aware that AI can be used to bully, harass or sexually harm children, including through the creation of sexual "deepfake" images, and that any such incident must be treated as a safeguarding concern and reported to the DSL immediately.

Mobile phones and personal electronic devices

In line with DfE guidance, Trust schools operate as mobile phone-free environments for pupils throughout the school day, with any exceptions (for example for medical needs) agreed in advance by the Principal. Each school's mobile phone policy, which may sit within the behaviour policy, sets out how phones and other personal devices are managed and the consequences for misuse. The use of personal electronic devices, including mobile phones and cameras, by staff is governed by the Staff Code of Conduct and is closely monitored. Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL.

Photographs and videos of pupils will be carefully planned before any activity, with particular regard to consent, and will adhere to the Data Protection Policy and Photography Policy. Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the Principal will liaise with the DSL to determine the steps involved. Staff will be made aware of the challenges that social media presents, will be given advice on how to manage their own profiles safely, and will receive training on school expectations regarding social media.

Communicating with parents

As part of the usual communication with parents, schools will reinforce the importance of pupils being safe online and will inform parents of the systems the school uses to filter and monitor online use. Schools will use face-to-face and online opportunities to offer guidance to parents on how to keep their child safe online, including in relation to AI and social media, and will make clear to parents what their children are being asked to do online for school and the associated risks.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling or securing activation by another person without that person's knowledge, for example a motion-activated camera. Upskirting will not be tolerated. Any incidents will be reported to the DSL, who will decide on next steps, which may include police involvement.

14. Sharing of Indecent and Semi-Indecent Images and Videos

Schools will ensure that staff treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos of children as a safeguarding concern. KCSiE 2026 is explicit that all incidents involving the sharing of indecent or semi-indecent images, whether consensual or non-consensual, and whether the image is real, digitally altered or wholly AI-generated, require a safeguarding response.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil and sexual behaviour that is inappropriate and harmful. Staff will follow school guidance in dealing with instances of sharing nudes and semi-nudes, including understanding motivations, assessing risks posed to pupils depicted in the images and how to report to the DSL. Staff will be aware of how to support pupils to have images removed from the internet, including through the Internet Watch Foundation "Report Remove" tool and Childline.

Creating, possessing and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed or distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised. Further information can be found in the UKCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Where a member of staff becomes aware of an incident of sharing nudes and semi-nudes, they will refer this to the DSL as soon as possible. They must not, under any circumstances, view, copy, print,

share, store or save the image themselves, or ask a pupil to share or download it. They should take possession of the device if appropriate and refer to the DSL, who will follow school safeguarding procedures.

15. Context of Safeguarding Incidents

Many safeguarding incidents occur outside of school and can be associated with outside factors. All staff, particularly the DSL and DDSLs, will know and understand the context of the school and where external safeguarding factors may occur. Staff should always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare (contextual safeguarding). The school will provide as much contextual information as possible when making a referral to CSC.

16. Pupils at Potential Risk of Greater Harm

The Trust recognises that some groups of pupils can face additional safeguarding challenges and that further barriers may exist when identifying abuse and neglect in these groups. Additional considerations for managing safeguarding concerns amongst these groups are outlined below.

Pupils who need social workers or are open to Family Help

Pupils may need social workers due to safeguarding and welfare needs, which can leave them vulnerable to further harm and educational disadvantage. As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker or is open to Family Help in order to make decisions in the best interests of the pupil's safety, welfare and educational outcomes, for example in responding to unauthorised absence and in considering pastoral or academic support.

Young carers

A young carer is a child who provides, or intends to provide, care for another person, usually a family member who has a physical or mental illness, disability or substance misuse issue. Caring responsibilities can affect a child's attendance, attainment, mental health and social development, and can mask or increase vulnerability to other harms. Staff will be alert to the signs that a pupil may be a young carer, including tiredness, lateness, unexplained absence, anxiety about a family member and taking on adult responsibilities. Schools will identify young carers, record this on the MIS and CPOMS, offer pastoral support, and, where appropriate, refer to the LA young carers' service and consider a young carer's needs assessment under the Children and Families Act 2014.

Pupils with medical conditions

Pupils with medical conditions may be more vulnerable to abuse and neglect, and their medical needs may create barriers to reporting. Schools will ensure that individual healthcare plans are in place in line with Supporting pupils with medical conditions at school, that staff administering medication or intimate care are appropriately trained and follow the school's intimate care procedures, and that any concern that a child's medical needs are not being met at home is treated as a potential safeguarding concern and reported to the DSL.

Electively home educated pupils

Parents may choose elective home education (EHE) for their children. This can pose additional safeguarding concerns if a pupil is not visible, including the risk of modern slavery and child sexual or criminal exploitation. School staff will not remove a child from roll until they have followed the LA's procedures for notification. If a child is within the social care system, the social worker will be informed immediately. If a child has SEND, is vulnerable, or has a social worker, a meeting will be called immediately and, if not already in place, a Family Help or early help assessment will be considered. Children in receipt of an EHCP should not be removed from the school roll until the LA

has been informed of the parent's intention. In line with the Education (Pupil Registration) (England) Regulations 2006 (as amended), the school will inform the LA of all deletions from the admissions register.

Flexi-schooling

Any school entering into a flexi-schooling agreement with parents must follow the relevant guidance to ensure that children are safeguarded whilst away from school. This is at the discretion of the Principal and will only be offered in exceptional cases after thorough consideration involving all stakeholders.

Children absent from education

Children who miss long periods of school are at greater risk of harm. Being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation, criminal exploitation, mental health difficulties and neglect. All staff should be aware of any child who is persistently or severely absent, including where the absence is inexplicable or deliberate. Processes will be in place to ensure safeguarding is effective when a child is off site, including home visits and regular meetings to assist the child in returning to full-time education. Further information can be found in the school's Attendance Policy and in Working Together to Improve School Attendance, which is statutory guidance.

Children looked after and previously looked after children

Children most commonly become looked after because of abuse and/or neglect, and can therefore be at potentially greater risk in relation to safeguarding. Previously looked after children can also remain vulnerable after leaving care. Schools should be knowledgeable about trauma-informed practice when making decisions to support these pupils. The HSABC can offer further advice and guidance. School leaders will ensure that staff have the knowledge, skills and understanding to keep CLA and PLAC safe, including ensuring that the appropriate staff have the information they need, such as the child's legal status, contact arrangements with parents or those with parental responsibility, and care arrangements and the levels of authority delegated to the carer. The DSL and Designated Teacher will be provided with the details of pupils' social workers, the VSH and, for PLAC, personal advisers; this should be easily accessible on the school MIS.

Children in kinship care

Staff will be aware that children in kinship care may have experienced trauma, loss or disruption and may need additional support. VSHs have a non-statutory responsibility to promote the educational achievement of children in kinship care, and the Designated Teacher will liaise with the VSH where appropriate.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware that: certain indicators of abuse, such as behaviour changes and injury, may be wrongly attributed to the pupil's disability without further exploration; pupils with SEND can be disproportionately impacted by bullying without outwardly showing signs; communication barriers may exist that affect the child's ability to report concerns; and children with SEND may have more difficulty understanding how to keep themselves safe. When reporting concerns or making referrals for pupils with SEND, these factors will always be taken into consideration. The DSL will liaise with the SENCO, and with the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

Pupils who are LGB or who are questioning their gender

The fact that a pupil is, or is perceived to be, lesbian, gay or bisexual, or is questioning their gender, is not in itself an inherent risk factor for harm. However, staff will be aware that these pupils can be targeted by others, and that a pupil perceived to be LGB or gender-questioning can be just as vulnerable as a pupil who identifies in that way. Risks can be compounded where pupils do not

have a trusted adult with whom they can speak openly. Schools will ensure that there are trusted adults available to whom pupils can speak, and will challenge homophobic, biphobic and transphobic bullying.

In line with KCSiE 2026 and the DfE guidance Gender questioning children, Trust schools will take a cautious, case-by-case approach to any request from a child relating to their gender. Decisions will be made by the Principal, involving the DSL and, save in exceptional circumstances where doing so would put the child at risk of significant harm, in partnership with parents. Schools will consider the safeguarding implications for the child and for other children, including the protection of single-sex spaces such as toilets, changing rooms and showers, and single-sex sport, and will consider whether an alternative facility can be provided without compromising the safety, comfort, privacy or dignity of the child or of other children. A clear record of the request, the considerations and the decision will be kept. Where there is a safeguarding concern, staff will follow the procedures in this policy, and the DSL will consider whether a referral for Family Help or to CSC is appropriate.

Pupils requiring mental health support

All staff will 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, and that safeguarding concerns can themselves cause or exacerbate mental health difficulties. Staff are not expected to diagnose mental health conditions, but should be alert to signs that a pupil may be experiencing a mental health difficulty, including changes in mood, behaviour, attendance, appearance or engagement; withdrawal; expressions of hopelessness; self-harm; disordered eating; and substance misuse. Staff must be made aware of any risk assessments or support plans in place for individual pupils. Staff who have a mental health concern about a pupil that is also a safeguarding concern will speak to the DSL or a DDSL without delay.

If a member of staff believes a pupil is in immediate danger, for example at imminent risk of harming themselves, they must not leave the pupil alone and must call 999 or take the pupil to A&E immediately; where the situation is urgent but not an emergency, NHS 111 should be contacted. The DSL and parents will be informed as soon as possible. Each school has an appointed senior mental health lead who has received appropriate training, and will refer to the school's Mental Health and Wellbeing Policy in all cases. Children whose attendance is affected by mental health difficulties will be offered early help. Positive mental health and wellbeing, including strategies to build resilience, will be taught through the curriculum.

17. Use of School Premises for Non-School Activities

Where school leaders hire or rent out school facilities or premises to organisations or individuals (for example community groups, sports associations and service providers running community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe. When services or activities are provided by the school, the school's child protection arrangements apply. Where services or activities are provided separately by another body, this is not necessarily the case. School leaders should therefore seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed, and should ensure there are arrangements for the provider to liaise with the school on these matters.

This applies irrespective of whether the children attending are on the school roll. The LAB should also ensure that safeguarding requirements are included in any transfer of control agreement (lease or hire agreement) as a condition of use, and that failure to comply will lead to termination. The DfE guidance Keeping children safe in out-of-school settings details the arrangements that schools should expect providers to have in place. Where an allegation is made against a person connected to an organisation using school premises, the school will follow the procedures in Appendix 3 and inform the LADO.

Sport and physical activity

KCSiE 2026 includes new content on safeguarding in sport. Staff, coaches and volunteers running sporting and physical activities, whether in curriculum time, extra-curricular clubs or through external providers, will be aware of the particular risks that can arise in sporting contexts, including physical contact, changing and showering arrangements, travel and overnight stays, and the influence of coaches. Schools will ensure that all coaches are appropriately checked, that safe changing arrangements are in place, and that providers work to the Standards for Safeguarding and Protecting Children in Sport. All national governing bodies of sport that receive funding from Sport England or UK Sport must meet these standards.

18. Alternative Provision

The school remains responsible for a pupil's welfare and education during their time at an alternative provision when the school is the commissioning body. When placing a pupil with an Ofsted-registered alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding and safer recruitment checks, and will conduct a thorough safeguarding and educational audit of the provider, with robust procedures around attendance and daily communication.

Vantage CE Academies Trust does not support the use of unregistered provision for any pupil within its schools. EHCP and CLA pupils must not be placed in unregistered provision commissioned by the school. If the school becomes aware that a provider is accepting CLA or EHCP pupils from other schools, it should cease using the provision immediately. In certain cases, the LA may commission unregistered alternative provision to satisfy section 19 of the Education Act 1996; in these cases, the school will obtain the written offer with confirmation that all safeguarding checks have been completed and details of how the LA intends to monitor safeguarding arrangements. Further information can be found in the DfE Alternative Provision statutory guidance.

19. Work Experience

If a school uses external providers for work experience, staff must ensure that the provider has appropriate safeguarding policies and procedures in place, including safer recruitment procedures. Where the school is used for work experience by others, enhanced DBS certificates will be obtained where applicable and the person will be added to the SCR.

20. Homestay Exchange Visits

Host families: homestay during exchange visits

Schools sometimes make arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. School staff have a duty to safeguard and promote children's welfare, which extends to considering their safety and how best to minimise risk of harm during any exchange visit the school arranges, and when organising care and accommodation with a host family (homestay). Homestay families in the UK are in regulated activity and will be subject to an enhanced DBS check with children's barred list information. Where criminal record information is disclosed, staff will consider, alongside all other information, whether the adult is a suitable host. The school will also consider whether an enhanced DBS check should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

Staff will liaise with partner schools to discuss and agree the arrangements for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission to ascertain what checks may be possible in respect of those providing homestay outside the UK. Staff will use professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child. Pupils will be provided with emergency

contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

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

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where staff become aware of a pupil being privately fostered, they will notify the DSL, who will notify CSC as soon as possible.

21. What to Do If You Are Concerned About a Child

Information regarding the specific procedures for the school can be found in Appendix 1, which sets out how to report a concern about a child, guidance about how a referral is made, and a flowchart of what happens when a concern is reported. In summary: if you are concerned about a child, act immediately, record the concern on CPOMS and speak to the DSL or a DDSL. If a child is in immediate danger, call 999.

22. Managing Referrals

Each school will know and understand how to refer into the LA and other safeguarding partners, including local Family Help arrangements. The school will not wait for the start or outcome of an investigation before protecting the child at risk and other pupils; this applies to criminal investigations as well as those made by CSC. Where CSC decides that a statutory investigation is not appropriate, school leaders will consider referring again if it is believed that the pupil is at risk of harm. Where school leaders agree with the decision, the school will consider other support mechanisms such as Family Help and pastoral support. If school leaders disagree with the decision of the referral and assessment team, they will challenge the decision through the LA escalation procedure, with the support of the HSABC.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and the reasons for doing so, in an age-appropriate way. Discussions of concerns with parents will only take place where this would not put the pupil or others at risk of harm. The school will work closely with parents to ensure that the pupil and their family understand the arrangements in place, are effectively supported, and know where they can access additional support.

The statutory flowchart from Part One of KCSiE is set out below.

Staff have concerns about a child and take immediate action. Staff follow this policy, record on CPOMS and speak to the DSL.		
Referral not required: school takes relevant action, possibly including pastoral support and/or Family Help, and monitors locally.	**Referral made if concerns escalate.**	**Referral required**: DSL or staff make a referral to CSC (and call the police if appropriate).
Within one working day, a social worker makes a decision about the type of response required.		
Child in need of immediate protection: referrer informed. Appropriate emergency action	**Section 47 enquiries appropriate**: referrer informed. Child identified as at risk of	**Section 17 enquiries appropriate**: referrer informed. Child identified as a child in

taken by a social worker, the police or the NSPCC.	significant harm; possible child protection plan.	need; appropriate support identified.
No formal assessment required: referrer informed. School considers pastoral support and/or a Family Help assessment, accessing universal services and other support.		
Staff should do everything they can to support social workers. At all stages, staff keep the child's circumstances under review (involving the DSL or deputies as required) and re-refer if appropriate. The child's best interests must always come first.		

23. Safeguarding Concerns and Allegations Against Staff

It is important that staff within the school foster an attitude of "it could happen here" and accept that allegations might be made. Staff must report any behaviour they feel may pose a risk to pupils in their school. If something does not look or feel right, it requires professional curiosity. School leaders will ensure that all allegations against staff, including those who are not employees of the school (supply staff, contractors, trainee teachers and volunteers), are dealt with appropriately and that school leaders liaise with all relevant parties. When managing allegations against staff, school leaders will recognise the distinction between allegations that meet the harm threshold and those that do not, also known as "low-level concerns" as defined in KCSiE. Allegations that meet the harm threshold include instances where a person has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Concerns that meet the harm threshold will be referred to the LADO via the LA reporting procedures. Low-level concerns will be reported to the Principal or DSL and a record kept securely following school procedures. All allegations of abuse against staff must also be reported to the HSABC and to Trust HR. Full procedures are set out in Appendix 3.

24. Communication and Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. This should be done with the pupil's best interests in mind. Sharing of information regarding safeguarding matters will be undertaken on a need-to-know basis and will be fully risk assessed and reviewed by the DSL.

Communication between staff should be done professionally through school-recognised communication platforms. Staff should not communicate with other staff on a professional basis through their own personal emails or social media platforms. Communication should be respectful and dignified at all times, and there should only be an expected response during accepted work hours. Staff should be mindful of their audience when communicating information within group emails.

When communicating safeguarding information, staff should keep the child's best interests as a priority whilst fulfilling safeguarding obligations. When communicating with individuals outside of the school community, secure email must be used. If that is not possible, documents and data should be password protected and the password sent separately. Emails should carry a data protection statement in the signature with guidance for situations where an email is received in error. Safeguarding information must not be entered into AI tools that have not been approved by the Trust.

Communication with parents and carers

Information should only be shared with an adult who is named on the school's MIS, unless they are a recognised agency. Sharing of information should happen with parental consent unless seeking consent would put the child at further risk. More information around sharing of information can be found in KCSiE and the DfE information sharing advice for safeguarding practitioners.

25. Safer Recruitment

Despite safeguarding policies being in place, it remains a disturbing fact that a minority of individuals will continue to seek access to children in order to exploit and inflict harm. Ongoing vigilance contributes to creating a diligent safeguarding culture, and following good safer recruitment processes is a critical first line of deterrent. School leaders must acknowledge that abuse happens and "it could happen here". This section should be read alongside the Trust Safer Recruitment Policy and Part Three of KCSiE.

Regulated activity

People who are barred from regulated activity relating to children must not work in that activity for any school. In an educational setting, regulated activity includes teaching, training, instructing, caring for or supervising children; providing advice or guidance on physical, emotional or educational wellbeing; and driving a vehicle only for children. The Crime and Policing Act 2026 has removed the "supervision exemption" from the definition of regulated activity. This means that any person, including a volunteer, who teaches, trains, instructs, cares for or supervises children frequently (on more than three days in any period of 30 days), or overnight, is in regulated activity even where they are themselves supervised by a member of staff. Trust schools will therefore obtain an enhanced DBS check with children's barred list information for all such volunteers before they begin, and have reviewed all existing volunteer arrangements accordingly. Volunteers whose activity falls outside this definition (for example a one-off visitor) may still be subject to an enhanced DBS check without barred list information following a risk assessment, and must never be left unsupervised with children.

Key elements of safer recruitment practice

Safeguarding must be considered at every stage of the recruitment process: planning, advertising, shortlisting, interview and appointment.

- The job description must include responsibility for safeguarding children, and the person specification must include reference to suitability to work with children.
- The job advert must state that the successful candidate will be subject to an enhanced DBS check with children's barred list information (where in regulated activity), a Section 128 check for relevant management posts, and online searches for all shortlisted candidates.
- The recruitment panel will be carefully selected and at least one member will have completed safer recruitment training within the last two years. It is good practice for all leaders and governors involved in recruitment to complete online safer recruitment training annually.
- On receipt of applications, the panel will check the application form, including employment and experience history, and ensure that any gaps or anomalies are satisfactorily explained; these must be checked at shortlisting and challenged at interview.
- All applicants must complete an application form. CVs will not be accepted in place of an application form. Schools will adopt a fair and methodical approach to shortlisting, using a grid to assess candidates against the essential and desirable criteria.
- Online searches will be carried out on all shortlisted candidates as part of due diligence, and any relevant matters will be explored at interview. Searches will be conducted by someone who is not on the interview panel and only publicly available information will be considered.

References

References must be obtained from the current and previous employer at the appropriate seniority. If the reference is from a school or college, this should be from the Principal or a member of the senior leadership team, and references should be obtained before the interview process begins. Offers of employment must only be made subject to satisfactory references. School leaders will:

- Not accept open references or rely on applicants to obtain their own references.
- Obtain verification of the candidate's most recent relevant period of employment where the candidate is not currently employed.
- Secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children); if the applicant has never worked with children, ensure a reference from their current employer is received.
- Verify information with the person who provided the reference and ensure electronic references originate from a legitimate work email address.
- Contact referees to clarify content where information is vague or insufficient, especially around safeguarding.
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate.
- Establish the reason for the candidate leaving their current or most recent post.
- Ensure any concerns are resolved satisfactorily before the appointment is confirmed.

References should be requested using a proforma which addresses the candidate's suitability to work with children. Invitations to interview should remind candidates to bring all relevant original documents, including their last DBS certificate if they have one, qualification certificates, proof of identity and right to work in the UK. Only original documents can be accepted; photocopies will be kept on the personnel file of the successful candidate.

Interview

Questions should enable the panel to assess the candidate's ability to meet the requirements of the role and their suitability to work with children. Other selection methods, such as presentations, in-tray exercises, pupil panels and preparing and delivering lessons, can be useful in assessing motivation and attitude towards children, especially those who are vulnerable. The assessment of all selection activities should be collected on a structured assessment sheet and kept with the interview notes and application forms. Panel interviews must include specific safeguarding questions, such as what the candidate would do if they had concerns about a child and what they would do if they had concerns about the behaviour of another member of staff.

Successful candidates and pre-employment checks

When a successful candidate is decided upon, a conditional offer of employment may be made, normally verbally and then confirmed in writing. All offers of employment must be conditional upon satisfactory completion of pre-employment checks. Under normal circumstances, candidates must not take up their position until all pre-employment checks are complete. Appointed candidates should not commence work until at least their identity and right to work in the UK have been verified. A candidate may exceptionally start prior to receipt of a DBS certificate provided that a separate children's barred list check has been completed, a written risk assessment approved by the Principal and DSL is in place, and they are not left unsupervised with children. A coloured lanyard system will be used to clearly identify an adult's status in school.

Pre-employment checks consist of:

Identity checks: Schools must be certain that the person they intend to employ is the person they claim to be, and must be aware of the potential for people to change their name. Photographic

evidence that includes a date of birth, such as a passport or driving licence, is the most suitable form of identification. If these are not available, at least three documents showing the individual's name and address and/or date of birth must be seen. A copy of the documents will be kept on the employee's file and details recorded on the SCR.

Right to work in the UK: By law an employer must check that all job applicants have the right to work in the UK before making a job offer. The Home Office Right to Work Checklist and the Employer's Guide to Right to Work Checks will be used.

Enhanced DBS check with children's barred list information: To be eligible for a children's barred list check, a person must be working in regulated activity. The check is requested when applying for an enhanced DBS check. The employer will not receive a copy of the DBS certificate; the applicant must bring in their original certificate so that the relevant details can be recorded on the SCR. If a candidate has subscribed to the DBS Update Service, they should still provide the original certificate and the school will carry out a status check with their consent.

Overseas criminal record checks: These are required for roles that are eligible for DBS checks where the individual has lived or worked outside the UK for three months or more (in one country) within the last five years and was over the age of 16. The individual is responsible for applying for this check; further information is available at gov.uk/government/publications/criminal-records-checks-for-overseas-applicants. Where a check is not available, additional references and a risk assessment will be obtained.

Academic and professional qualifications: School leaders must verify that a potential employee has achieved the qualifications claimed and view each original qualification or a properly certified copy. Qualifications achieved overseas will be verified through UK ENIC. For teachers, Teacher Status Checks can be made through the DfE Sign-in service.

Prohibition from teaching check: Before employing a person to carry out teaching work, school leaders must take reasonable steps to establish whether that person is subject to a prohibition order or interim prohibition order issued by the Secretary of State, or any sanction or restriction imposed by the former General Teaching Council for England that remains current.

Section 128 prohibition from management check: Individuals engaged in management roles in the school or Trust, including governors and trustees, must be subject to a check to ensure they are not prohibited from taking part in the management of a school under a Section 128 direction.

Health: It is important to ensure individuals are physically and mentally fit to do the job before a firm offer of employment is made and they start work.

Childcare disqualification: All staff employed to work in early years settings, or who provide care in wraparound provision for children aged under 8, must disclose anything that is a relevant offence under the Childcare (Disqualification) Regulations, and must disclose where they live with someone who has a relevant offence, in line with DfE guidance Disqualification under the Childcare Act 2006.

Trainee teachers

Trainee teachers on salaried routes are subject to the same checks as employees. For fee-funded trainees, the initial teacher training provider is responsible for the checks; the school must obtain written confirmation from the provider that all pre-appointment checks have been carried out and that the trainee has been judged suitable to work with children. The DSL should see a copy of this confirmation, and the trainee will be recorded on the SCR. Trainee teachers are subject to this policy, the staff code of conduct and the allegations procedures in the same way as staff.

Retention of recruitment records

All documentation gathered as part of the recruitment exercise must be stored securely and confidentially for the duration of an employee's employment and six years thereafter. For unsuccessful candidates, all documentation should be kept for at least six months, including the advert, job description and person specification, application pack, completed application forms, shortlisting notes and grid, invitations to interview, interview notes and notes of any feedback provided.

26. Single Central Record (SCR)

Information about all school staff (including trainee teachers on salaried and fee-funded routes, agency and third-party supply staff, even if they work for one day), governors, trustees, volunteers in regulated activity and regular visitors to the school must be kept on the school's SCR. For agency and third-party supply staff, the SCR must include whether written confirmation has been received that the employment business has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received, and whether details of any enhanced DBS certificate have been provided.

The following checks must be recorded on the SCR:

- An identity check.
- A standalone children's barred list check, where applicable.
- An enhanced DBS check (with children's barred list check where in regulated activity), with date requested and certificate details.
- A prohibition from teaching check.
- Further checks on people who have lived or worked outside the UK.
- A check of professional qualifications, where required.
- A check to establish the person's right to work in the UK.
- Section 128 checks for school leaders, governors and trustees.
- Whether staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements.
- Checks made on governors, trustees and volunteers.
- Online checks for shortlisted candidates.
- Dates when safer recruitment and safeguarding training were completed.
- The name of the person who carried out each check.

Vantage CE Academies Trust holds the SCR centrally and has responsibility for updating central team details and records. The DSL and the HSABC will routinely carry out checks on the SCR to monitor gaps or discrepancies, and an action plan will be generated where required to ensure compliance. The LGS will ensure an SCR check is carried out termly and that any issues identified are addressed promptly. It is the Principal's responsibility to ensure that the SCR is complete and up to date. The details of an individual should be removed from the SCR when their employment or engagement with the school ceases.

Regular visitors and visiting professionals

People who are regular visitors to the school should be held on the SCR. Visitors who come to school in a professional capacity should have their ID checked and photo ID must be presented. A DBS certificate is not required to be presented by visiting professionals; internal school procedures should be followed. Health and social care professionals, and any other professional undertaking regulated activity, should have a letter of assurance from their employer to verify that relevant checks have been completed. If there are any doubts regarding the authenticity or status of a

visitor attending school in a professional capacity, staff should not allow unsupervised access to children.

27. Handling Disclosures

Guidelines for responding to a person making a safeguarding disclosure

Whenever a child reports that they are suffering or have suffered significant harm through abuse or neglect, or have caused or are causing harm to others, the initial response should be limited to listening carefully to the child. If someone makes a disclosure, this might be the only time they will tell someone about what is happening.

How to respond:

- Listen, and take what is said seriously.
- Only use open questions (who, what, when, where and how). Open questions cannot be answered with a "yes" or "no".
- Remain calm. The information may be shocking or upsetting, but do not react. Acknowledge the impact on you as soon as possible after the event with a colleague.
- Consider the person's age and level of understanding.
- Check, if face to face, whether they mind you taking notes so that you capture the information accurately. At the end, check with them that you have understood everything correctly.
- Offer reassurance that disclosing is the right thing to do.
- Establish only as much information as is needed to tell the DSL what is believed to have happened, when and where. The more times a child has to repeat their account, the more traumatic it can be. The full disclosure will need to be made to the statutory agencies.
- Check what the child hopes will result from the disclosure, and tell the child what you are going to do next.

Do not:

- Make promises that cannot be kept (for example that you will not share the information).
- Make assumptions or offer alternative explanations.
- Investigate. That is the responsibility of the statutory agencies; investigating could compromise a police investigation.
- Contact the person about whom allegations have been made.
- Carry out a physical or medical examination.

Recording:

- Make brief notes at the time, if appropriate, and write them up in full on CPOMS as soon as possible afterwards and on the same day.
- Record the date, time, place and the actual words used.
- Record facts and observable things, not interpretations or assumptions, and do not speculate or jump to conclusions.

Reporting:

- Report the matter to the DSL immediately. If there is immediate danger to a child, contact the police.
- The DSL will advise regarding reporting to CSC and/or the police. This must be done within 24 hours; if there is a risk of immediate danger, it should be done straight away and without delay. If in any doubt, seek advice from CSC and/or the police. The HSABC is also available to advise and offer guidance.

Disclosure from a child who has caused harm

A disclosure may be made by a child who is a convicted offender or by a child who is disclosing previously unreported abuse they have caused. It is not unusual for a child to make such a disclosure in school, as it can be deemed a safe place with staff being stable, positive adult role models. The motive may be a desire to address the problem and obtain help, and disclosing can bring a sense of relief. The person who admits to a potential offence against a child must be told that the information cannot be kept confidential and will be passed on to CSC and/or the police. Be supportive but do not seek more details than you need. Report immediately to the DSL.

Recording and reporting

All concerns, discussions and decisions made, with the reasons for those decisions, should be recorded in writing using CPOMS. This will also help if and when responding to any complaints about the way a case has been handled. Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome. If in doubt about recording requirements, staff should discuss with the DSL or DDSL and refer to the Trust CPOMS Handbook.

28. Training

All staff must undertake regular safeguarding training to be sufficiently equipped to recognise, respond to and act on safeguarding concerns.

All staff: Part One of KCSiE

From September 2026, all staff, including those who do not work directly with children (for example office, catering, site and administrative staff), must read Part One of KCSiE in full. The previous condensed Annex A has been withdrawn and may no longer be used. The DSL will ensure that staff have read and understood Part One and will retain a signed record. Staff will also read and confirm that they have understood this policy, the staff code of conduct, the behaviour policy, the online safety policy, the child-on-child abuse policy and the school's response to children absent from education.

Induction training

Induction training will include how to report concerns, including concerns about staff and low-level concerns; the context of the school and key information about the school culture and the expectations of all staff; the school's filtering and monitoring arrangements and what to do if systems are compromised; the school's approach to mobile phones and AI; and the roles and responsibilities of the DSL and DDSLs. Induction will be completed before a new member of staff, trainee or volunteer has unsupervised contact with children.

Face-to-face training for all staff

This will include information about the context of the school and any changes in school policies, procedures or practice. A diligent safeguarding culture will be promoted that reinforces the fact that "it could happen here". Face-to-face training will include any statutory requirements and guidance updates, including the changes introduced by KCSiE 2026.

Online training

Online safeguarding training will be completed at least every three years, although good practice advises it should be undertaken more regularly. Prevent duty training is an annual requirement, and staff will be encouraged to use the DfE Prevent duty training. Online modules will also be used for specific safeguarding issues particular to the school or to a member of staff's role, including online safety, filtering and monitoring, and AI.

DSL and DDSL

The DSL and DDSLs are required to undertake specific training for their role at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, through supervision, peer networks and Trust briefings. DSLs will also receive training on online safety, filtering and monitoring, and the management of allegations and low-level concerns.

Principal, Lead Governor for Safeguarding, governors and trustees

The Principal and LGS will undertake DSL-level training to fully understand the role of the DSL and to be able to make strategic decisions. They will also receive specific training on making referrals to the LADO and managing staff allegations. All governors and trustees will receive safeguarding training on induction and at least annually thereafter, and will read Part One and Part Two of KCSiE.

29. Record Keeping

Records of safeguarding training must be retained by the DSL. These should include:

- A record that staff have received and read key safeguarding policies, including this policy, the staff code of conduct, the online safety policy, the behaviour policy and the child-on-child abuse policy.
- A record that all staff, including those who do not work directly with children, have received and read Part One of the current version of KCSiE in full.
- A record of completed annual Prevent duty training.
- A record of completed online safeguarding training.
- A record of completed face-to-face training, including KCSiE updates.
- A record of the annual filtering and monitoring review.

The school will keep a record of all completed safeguarding training, including the dates the training was completed and the certificates achieved. There must be an up-to-date log acknowledging that staff have received and read all policies relating to safeguarding in addition to Part One of KCSiE. Child protection records will be kept on CPOMS in line with the Trust CPOMS Handbook and the Data Protection Policy, and will be transferred securely when a pupil moves school.

30. Monitoring and Review

This policy is subject to annual review by the HSABC and the Board of Trustees, and additionally whenever changes to legislation and/or statutory guidance are issued. Each school's LAB will review the policy annually alongside its local safeguarding procedures. The Trust and all school governing bodies will exercise their responsibilities in monitoring and reviewing this policy in line with their statutory obligations. The next scheduled review is September 2027.

Appendix 1: Flowchart of procedures for responding to safeguarding concerns

Each school must complete the contact boxes below with its own local details (see also Appendix 5).

Designated Safeguarding Lead Name: Contact:	**Deputy DSL(s)** Name: Contact:	**Local Authority Designated Officer (LADO)** Name: Contact:
Children's Social Care (CSC) / Family Help front door Contact:	**Out of hours emergency duty team** Contact:	**HSABC (Trust)** Jess Lane Contact:

Step 1: A member of staff has a safeguarding concern about a child, or a child makes a disclosure. If the child is in immediate danger, call 999 first.
Step 2: The concern is recorded on CPOMS the same day (using the Trust disclosure form in Appendix 4 where CPOMS is unavailable) and reported directly to the DSL or a DDSL without delay.
Step 3: The DSL reviews the concern, considers previous concerns and context, seeks advice from the HSABC, CSC or the LADO as needed, and decides whether the threshold for referral is met.
Step 4a: No referral. The DSL records the rationale, and the school takes relevant action: pastoral support, monitoring, an early help or Family Help assessment, or signposting to universal services. The situation is reviewed at an agreed date and a referral is made if concerns escalate. **Step 4b: Referral required.** The DSL makes a referral to CSC using the local referral form or front door, and to the police where a crime may have been committed. Any staff member can make a referral if the DSL is not available.
Step 5: Within one working day, a social worker decides the type of response required and informs the referrer: immediate protection; Section 47 enquiries (child at risk of significant harm, possible child protection plan); Section 17 assessment (child in need); or no formal assessment (school considers pastoral support and Family Help).
Step 6: All concerns, decisions and actions are logged on CPOMS. The child's circumstances are kept under review at all stages, and the DSL re-refers or escalates through the LA escalation procedure if the child's circumstances are not improving. The child's best interests must always come first.

If the concern is about a member of staff, trainee, contractor or volunteer, report it to the DSL or Principal (or the Chair of Governors if it concerns the Principal), who will refer to the LADO and inform the HSABC and HR. See Appendix 3.	If your concern would involve a Prevent or Channel referral, speak to the DSL, who will contact the local Prevent lead or police Prevent team. Contact:	If you have a concern that a girl has undergone, or is about to undergo, FGM, contact the police and CSC immediately. Teachers have a mandatory duty to report known cases of FGM in under-18s to the police.

Appendix 2: Specific Safeguarding Issues

This appendix clarifies specific safeguarding issues that pupils may experience and outlines the responses to be taken. These issues include, but are not limited to:

1. Domestic abuse
2. Homelessness
3. Children absent from education and the admissions register
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE) and county lines
6. Cybercrime and AI-enabled harm
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM and honour-based abuse
10. Virginity testing and hymenoplasty
11. Forced marriage and child marriage
12. Radicalisation and extremism
13. Pupils with parents or carers in prison, and pupils giving evidence in court
14. Mental health, self-harm and disordered eating
15. Serious violence, weapons and violence against women and girls
16. Fabricated or induced illness
17. Child-to-parent abuse

Domestic abuse

In line with the Domestic Abuse Act 2021, domestic abuse is abusive behaviour of a person towards another person (including conduct directed at someone else, such as the person's child) where both are aged 16 or over and are personally connected. Abusive behaviour includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, and psychological or emotional abuse. Children who see, hear or experience the effects of domestic abuse are victims in their own right. All staff will be aware of the signs of domestic abuse and follow safeguarding procedures where concerns arise.

Operation Encompass is an initiative whereby the police notify schools when they attend incidents of domestic abuse where there is a child of school age living in the household, whether or not the child was present. With this information, the DSL can appropriately risk assess the situation and take action to support the child.

Homelessness

The DSL and DDSLs will be aware of the contact details and referral routes into the local housing authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, anti-social behaviour, and any mention of a family moving home because "they have to". Referrals to the housing authority do not replace referrals to CSC where a child is being harmed or is at risk of harm. For 16 and 17 year olds, homelessness may not be family based and referrals to CSC will be made as necessary. An early help or Family Help assessment will be considered for anyone at risk of becoming homeless.

Children absent from education and the admissions register

A child who is absent from school is a potential indicator of abuse or neglect, and these children are at increased risk of harm, exploitation or radicalisation. Staff will monitor pupils absent from school, particularly on repeat occasions, and liaise with the DSL in line with school and LA procedures. The school will inform the LA of any pupil who fails to attend regularly or has been absent without permission for a continuous period of 10 school days or more. Children whose whereabouts cannot be established must be brought to the immediate attention of the LA, and where appropriate the police should complete a safety and welfare check.

Pupils are placed on the admissions register at the beginning of the first day agreed by the school. Staff will notify the LA within five days of a pupil's name being added to the register and will keep the register accurate at all times, holding at least two emergency contacts for each pupil. A pupil's name cannot be retrospectively deleted, and attendance must be recorded up to the date of deletion. When a parent notifies the school of a change of address or a move to another school, the school will record the required details. Where a pupil moves to a new school, data will be transferred securely. The school will inform the LA of any pupil to be deleted from the register in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), including where they are to be educated otherwise than at school, have ceased to attend and no longer live within a reasonable distance, have been in custody for more than four months, or have been permanently excluded. A pupil will not be removed from the register without written confirmation from the LA. The school will work with the LA and within Working Together to Improve School Attendance to reintegrate pupils into full-time education.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child, and can be committed by parents, relatives, people known to the child, and strangers. All staff will be alert to community safety incidents in the vicinity of the school that may raise concerns, such as people loitering nearby or unknown adults conversing with pupils, and risk assessments will be considered. Pupils will be given practical advice in lessons to keep themselves safe, underpinned by a carefully sequenced PSHE curriculum.

Child criminal exploitation (CCE) and county lines

CCE is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the child needs or wants, for the advantage of the perpetrator, or through violence or the threat of violence. Specific forms include transporting drugs or money through county lines, accruing drug debts, working in cannabis factories, shoplifting, vehicle crime, and committing or threatening serious violence. Staff will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and that pupils of any gender are at risk. Indicators include unexplained gifts, money or possessions; associating with other children involved in exploitation; changes in emotional wellbeing; misuse of drugs or alcohol; going missing or regularly coming home late; and regularly missing education.

County lines refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money. Additional indicators include going missing and being found in areas away from home, being the victim or perpetrator of serious violence, receiving requests for drugs via a phone line, "plugging", being found in accommodation they have no connection with, owing a "debt bond", and having their bank account used to facilitate drug dealing. Staff who suspect a pupil may be involved in county lines will immediately report to the DSL, who will consider a referral to the National Referral Mechanism.

Cybercrime and AI-enabled harm

Cybercrime is criminal activity committed using computers and/or the internet. It includes cyber-enabled crimes (crimes that can happen offline but are enabled at scale online) and cyber-dependent crimes such as hacking, denial of service attacks ("booting"), and making, supplying or obtaining malware. Staff will be alert to the signs that a pupil may be at risk of involvement in cybercrime and will follow safeguarding procedures, which may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme. Staff will also be alert to the use of AI tools to create sexual or abusive images of children, to impersonate or bully others, or to generate extremist or harmful content, all of which will be treated as safeguarding concerns.

Child sexual exploitation (CSE)

CSE is a form of 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, for the advantage of the perpetrator, or through violence or the threat of violence. CSE can occur over time or be a one-off, may happen without the pupil's immediate knowledge (for example through others sharing images), and can affect pupils aged 16 and over who can legally consent. Pupils may not realise they are being exploited. Indicators include those listed for CCE together with having older partners, sexually transmitted infections, sexual behaviours beyond expected development, and pregnancy. Where CSE or the risk of it is suspected, staff will discuss the case with the DSL and local safeguarding procedures will be followed.

Modern slavery

Modern slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour, and can include CCE and CSE. Staff will be alert to the signs that a pupil may be a victim, including involvement in car washes, domestic work, manual labour, farm labouring, travelling fairs, and inexpensive childcare, and will be aware of the National Referral Mechanism.

FGM and honour-based abuse

FGM comprises all procedures involving the 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. Under Section 5B of the Female Genital Mutilation Act 2003, teachers are legally required to report personally to the police any discovery, whether through disclosure or visual evidence, of FGM on a pupil under 18. Teachers will not examine pupils. The DSL must be notified of any situation involving known or suspected FGM. Indicators of heightened risk include the family's community of origin, a mother or sister who has undergone FGM, and withdrawal from PSHE and PE. Indicators that FGM may take place soon include a female elder visiting from the country of origin, a girl confiding that she is to have a "special procedure" or ceremony, and talk of a long holiday to a country where FGM is prevalent. Indicators that FGM has taken place include difficulty walking, sitting or standing, spending longer in the toilet, prolonged absences followed by withdrawal, and reluctance to undergo medical examinations.

FGM is a form of honour-based abuse (HBA), which involves crimes committed to protect or defend the perceived honour of the family and/or community. All forms of HBA are abuse and will be treated and escalated as such. Staff will consult the DSL, who will activate local safeguarding procedures. Staff will not approach the family or community members where this could increase the risk to the child.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer, or aid and abet virginity testing or hymenoplasty in any part of the UK, and for UK nationals and residents to do so outside the UK. Both are forms of violence against women and girls, are part of the cycle of HBA, and can be precursors to forced marriage. Indicators include a pupil requesting either procedure or asking for help; family disclosure; pain or discomfort; concern from family that the pupil is in a relationship or

plans for marriage; a close relative having been subjected to a procedure; other HBA concerns; signs of trauma; fear of family members; and unexplained absence. Staff will raise concerns immediately with the DSL. Where there is believed to be immediate danger, the police will be contacted. The school will not involve families or community members, including as interpreters, as this may increase the risk of harm. Pupils will be educated about the harms of these practices through the RSHE curriculum.

Forced marriage and child marriage

A forced marriage is one where one or both spouses do not consent but are coerced into it through physical, psychological, financial, sexual or emotional pressure, or where a person lacks the capacity to consent. It is illegal for a marriage to take place in England and Wales where either party is under 18. Indicators include persistent absence, requests for extended leave, fear about school holidays, surveillance by siblings or cousins, a decline in behaviour or performance, withdrawal from school or extra-curricular activities, a sudden engagement, family history of forced marriage, and signs of mental health difficulties. Staff will speak to the DSL or Principal, who will ensure the pupil is spoken to privately and that local procedures are followed, including referral to CSC, the police or the Forced Marriage Unit. Staff must not approach the pupil's family or those with influence in the community without the pupil's express consent. Schools will teach about forced marriage within the RSHE curriculum and will support victims to understand their rights and access legal advice and support.

Radicalisation and extremism

Radicalisation is the process by which a person comes to support terrorism and extremist ideologies. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to negate or destroy the fundamental rights and freedoms of others, undermine or overturn the UK's system of liberal parliamentary democracy, or intentionally create a permissive environment for others to achieve these aims. Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties under the Prevent duty (section 26 of the Counter-Terrorism and Security Act 2015). Staff will be alert to changes in behaviour that could indicate a pupil may need help or protection, including online exposure to extremist and conspiracist content, and will use professional judgement to identify pupils at risk, contacting the DSL, who may make a referral to Channel. Any concerns will be discussed with parents unless the school has reason to believe the child would be placed at risk. The DSL and all staff will undertake Prevent awareness training appropriate to their role.

Pupils with parents or carers in prison, and pupils giving evidence in court

Pupils with parents or carers in prison will be offered pastoral support as necessary and, where appropriate, information from Action for Prisoners' Families. Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support and provided with the relevant age-appropriate HMCTS "Going to court" booklet (5 to 11 or 12 to 17), with the opportunity to discuss questions and concerns.

Mental health, self-harm and disordered eating

Staff will be aware that mental health difficulties can be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation, and that abuse and adversity can cause lasting harm to mental health. Staff will not attempt to diagnose, but will identify pupils whose behaviour suggests they may be experiencing a difficulty and will speak to the DSL where there is also a safeguarding concern. Staff will be particularly alert to self-harm and disordered eating, which are safeguarding concerns in their own right and must be reported to the DSL the same day. The school will use a range of resources and work with external agencies, including mental health support teams and CAMHS. Where a pupil is in immediate danger, staff will call 999 or take the

pupil to A&E, or contact NHS 111 where it is urgent but not an emergency. The school's Mental Health and Wellbeing Policy will be referred to in all cases.

Serious violence, weapons and violence against women and girls

Through training, staff will be made aware of the indicators which might signal that a pupil is at risk from, or is involved with, serious violent crime. These include increased absence, a change in friendships, relationships with older individuals or groups, a significant decline in academic performance, signs of self-harm, a significant change in wellbeing, signs of assault, unexplained injuries, and unexplained gifts or new possessions. Risk factors include being male, frequent absence, permanent exclusion, experience of maltreatment and prior involvement in offending. KCSiE 2026 requires that any concern that a child is using or carrying a weapon, or has expressed an intention to do so, is reported immediately to the DSL or a DDSL, who will assess the risk and take appropriate action, including informing the police where necessary. Staff who suspect a pupil may be vulnerable to, or involved in, serious violence will report their concerns to the DSL without delay.

Violence against women and girls (VAWG) includes sexual violence, sexual harassment, stalking, domestic abuse, honour-based abuse and online abuse, and is underpinned by misogynistic attitudes that can develop in childhood, including through online content. Trust schools will challenge sexism and misogyny wherever it arises, will teach about healthy relationships and respect through RSHE, and will treat misogynistic behaviour, harassment and abuse as safeguarding matters.

Fabricated or induced illness (FII)

FII is a rare form of child abuse in which a parent or carer exaggerates or deliberately causes symptoms of illness in a child, or persuades healthcare professionals that the child is ill when they are healthy. The parent or carer may not intend to deceive, but their behaviour is likely to harm the child, for example through unnecessary treatment or tests, being made to believe they are ill, or disrupted education. Cases where a parent wrongly reports symptoms are much more common than cases where illness is induced. FII is a child safeguarding issue requiring specialist guidance. Staff who suspect FII must report their concerns to the DSL, who will liaise with CSC and health professionals and follow local procedures. Staff must not confront the parent or carer directly.

Child-to-parent abuse

Child-to-parent abuse involves a pattern of behaviour by a child that is used to control, dominate or coerce a parent or carer, and can include physical violence, threats, damage to property and financial abuse. It is a form of harm within the family that can affect the whole household, including siblings. Staff will be alert to disclosures from parents and to indicators in the child's behaviour, and will report concerns to the DSL, who will consider Family Help or referral to CSC and specialist services.

Appendix 3: Good Working Practice

Staff guidelines

In line with safer working practice guidance and the Staff Code of Conduct, staff should be guided by the following advice to avoid false allegations and situations which may give rise to misinterpretation:

- Avoid, whenever possible, unobserved one-to-one contact with a child. If unavoidable, keep a door open, ensure staff are within the hearing of another member of staff, and ensure there is a clear purpose to the activity.
- Do not transport children alone in a vehicle. If absolutely unavoidable, notify the DSL as soon as possible; the child should sit in the back seat and both the child and the member of staff should carry a mobile phone. Any concerns must be reported immediately to the DSL and followed up in writing.
- Do not engage in or allow any sexually provocative games, whether based on talking or touching, or engage in "horseplay" involving pupils.
- Never make suggestive or discriminatory comments to a pupil.
- Avoid "favouritism" and singling out "troublemakers".
- Never trivialise child abuse or safeguarding matters.
- Do not communicate with pupils through personal devices, personal email or social media, and do not accept or send friend or follow requests to or from pupils.
- Do not use AI tools to draft records about, or communications with, pupils unless the tool has been approved by the Trust.

Staff should be mindful that off-site environments present greater opportunities for contact between children and staff. Schools will issue clear guidance and codes of conduct to staff and pupils prior to any visit, maintain an Educational Visits Coordinator to oversee the organisation and safety of all trips and visits, and ensure all trips and visits are underpinned by detailed risk assessments.

Use of reasonable force and restrictive intervention

Staff may use reasonable force to prevent a pupil from hurting themselves or others, from damaging property, or from causing disorder, in line with the DfE guidance Use of reasonable force and restrictive practices in schools and the Trust policy. Any use of reasonable force or restrictive intervention must be proportionate, the minimum necessary, and used only as a last resort. Every incident will be recorded by the DSL (including the date, time, reason, staff involved and any injuries), reported to parents, and reviewed to identify learning. Schools will ensure that staff working with pupils who are at higher risk of needing physical intervention are appropriately trained, and that individual plans are in place for pupils with SEND.

Safeguarding concerns and allegations against staff or another adult in the school (including supply teachers, trainee teachers, volunteers and contractors)

Safeguarding allegations or concerns, no matter how small, may be made against a member of staff, a volunteer, a trainee, a governor, a pupil, a parent or another person connected to the school. Allegations against staff will be dealt with according to the statutory guidance in Part Four of KCSiE and LA procedures. These procedures apply in all cases in which it is alleged that a person working in or on behalf of the school has behaved in a way that has harmed a child or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way that indicates they may pose a risk of harm to children; or behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

Staff and volunteers who hear a safeguarding allegation or concern against another adult must immediately report the matter to the DSL or Principal, unless the DSL is the person against whom the allegation is being made, in which case the allegation must be made to the Principal. If the accused is the Principal, it should be reported to the Chair of Governors, who will inform the HSABC. In the case of alleged serious harm, the police must be informed immediately. Where there is a conflict of interest in reporting to the Principal or DSL, the Trust whistleblowing procedure should be followed.

In the event of a safeguarding allegation being made against a member of staff, the Principal (as case manager), supported by the DSL, will immediately, and without further investigation, refer the matter to the LADO. The HSABC and Trust HR must also be informed. All information pertinent to the case must be communicated to the LADO, as the failure to pass on a critical piece of information could materially affect the advice given. The LADO's advice will be sought in borderline cases. The LADO's role is not to investigate but to ensure an appropriate investigation is carried out. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO.

The member of staff against whom an allegation has been made will be advised to contact their trade union representative, and the school or Trust will appoint a named contact to keep the person informed and offer support. If the allegation concerns supply staff or a contractor, the agency or employer will be notified and fully involved. Allegations against a member of staff who no longer works at the school, and historical allegations, will be referred to the police. Parents of the pupil will be informed of the allegation as soon as possible, unless the police or CSC advise otherwise, and will be kept informed of progress and outcome within the constraints of confidentiality.

Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed. Suspension should not be an automatic response to an allegation; all options to avoid suspension should be considered first, and advice will always be sought from the LADO. Suspension should be considered only where there is cause to suspect a child or other children are at risk of harm, or the case is so serious that it might be grounds for dismissal. Alternatives to be considered following a thorough risk assessment include redeployment so that the individual does not have direct contact with the child or children concerned, providing an assistant to be present when the individual has contact with children, redeploying to alternative work without unsupervised access to children, moving the child or children to classes where they will not meet the member of staff (making clear this is not a punishment and consulting parents), or temporary redeployment to another Trust school.

If immediate suspension is considered necessary, the rationale and justification, including the alternatives considered and why they were rejected, will be agreed and recorded by the case manager and the DSL. Written confirmation will be dispatched within one working day. A suspended person must not be left without support and will be told who their named contact is. Police involvement does not make suspension mandatory. Where the Secretary of State has made an interim prohibition order, immediate action will be taken to ensure the individual does not carry out teaching work.

Outcomes and timescales

The outcome of an investigation will be recorded as substantiated (sufficient evidence to prove the allegation), unsubstantiated (insufficient evidence to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and evidence of a deliberate act to deceive), or unfounded (no evidence or proper basis supporting the allegation). If an allegation is false, unsubstantiated, unfounded or malicious, no details will be retained on the individual's personnel record or referred to in references. In all other circumstances, a written record will be

retained on the personnel file in accordance with DfE guidance. Where an allegation is malicious, school leaders will consider appropriate action in line with the behaviour policy.

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Target timescales in KCSiE will be achieved in all but truly exceptional cases. If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff, the Trust will consider a referral to the TRA. The Trust will report promptly to the DBS any person whose services are no longer used for regulated activity because they have caused harm or posed a risk of harm to a child; this is a legal duty and failure to refer when the criteria are met is a criminal offence. The Trust will make a serious incident report to the Charity Commission where the Commission's guidelines deem it appropriate.

Confidentiality and reporting restrictions

When an allegation is made, school leaders will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated. The Education Act 2011 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, until the point that the accused is charged with an offence or the Secretary of State publishes information about a decision in a disciplinary case. "Publication" includes any communication addressed to the public, including social media. The case manager will take advice from the DSL, the police and the LADO about who needs to know, exactly what information can be shared, and how to manage speculation, leaks and gossip.

Low-level concerns

The Trust promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school, including supply teachers, trainees, volunteers and contractors, are dealt with promptly and appropriately. A low-level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that an adult may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and which does not meet the harm threshold. Examples include being over-friendly with children, having favourites, taking photographs of children on a personal phone, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating or offensive language, and engaging with pupils on social media.

Low-level concerns must be reported to the DSL, who will inform the Principal, or directly to the Principal. If the concern relates to the DSL, it should be reported to the Principal; if it relates to the Principal, to the Chair of Governors. Reports will be recorded in writing, noting who raised the concern, the details, the context and the action taken. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will decide on a course of action, either through disciplinary procedures or, where the pattern moves to meet the harm threshold, by referral to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur. Reports about supply staff and contractors will be notified to their employers.

Whistleblowing

All staff are required to report to the DSL or Principal any concerns about poor or unsafe safeguarding practice in school, potential failures to safeguard the welfare of pupils, or any action by staff or pupils that represents a safeguarding risk. If a member of staff feels unable to share a concern with the Principal, they should contact the Chair of Governors or the HSABC. Staff should be aware that the NSPCC whistleblowing advice line (0800 028 0285, help@nspcc.org.uk) is available for staff who do not feel able to raise safeguarding concerns internally. The Trust

Whistleblowing Policy is available on the Trust website and should be displayed prominently within the school.

Self-reporting

If you have been involved in an accident, incident, conversation or situation which has made you feel uncomfortable, that might have been misinterpreted, or that you feel might be used against you, report this to the DSL. This might include a suggestive comment from a pupil; accidental or embarrassing physical contact; a misunderstanding; a confrontation; an instance where physical restraint or reasonable force was necessary; or a situation in which a pupil has requested to follow you on, or has named you on, social media.

Appendix 4: Safeguarding Concern / Disclosure Form

Use this form only where CPOMS is unavailable. Transfer the record to CPOMS as soon as possible and hand the original to the DSL.

Part 1: Safeguarding concern / disclosure (to be completed by the member of staff)

Full name of the pupil	
Date of birth	
Year group	
Class teacher / form tutor	
Your name and position in the school	
Potential category of abuse	Neglect / Physical / Emotional / Sexual / Disclosure / Other type of harm (please state)
Nature of concern / disclosure	**Concern**: enter as much detail as possible to ensure the DSL understands your concern. **Disclosure**: include where you were when the child made the disclosure, what you saw, who else was there, what the child said or did, and what you said. Use the child's exact words. If there is an injury, record its size and shape and complete a body map. Make it clear if you have raised a concern about a similar issue previously.
Time and date of the incident	
Name of DSL the form has been handed to	
Signature	
Time and date form completed	

Part 2: To be completed by the Designated Safeguarding Lead

Time and date information received, and from whom	
DSL endorses the reason for the concern	Yes / No
Any advice sought (include date, time, name, role, organisation and advice given)	
Action taken (include rationale for decision making; referral to CSC or Family Help, monitoring, advice given to staff, EHA, with reasons)	
Parents / carers informed	Yes (include date and time) / No (give reason for decision)
Outcome (record names of individuals and agencies who have given information regarding the outcome of any referral)	
Follow-up action	
Additional information relevant to the concern, including reference to previous concerns	
Should monitoring be set up for this child?	Yes (provide reasons) / No (provide reasons)
Feedback given to Principal	Yes (detail action discussed) / No (provide reasons)
Feedback given to person who recorded the concern / disclosure	
Feedback given to pupil's class teacher, including any actions	
Feedback given to the child (if appropriate)	
Signed	
Date	

Appendix 5: School Local Information

Trust-level contact: Jess Lane, Head of Safeguarding, Attendance, Behaviour and Culture (HSABC). Each school must ensure the details below are checked at the start of each term and updated on CPOMS and on the school website.

School	Principal	DSL	DDSL	LA	CSC contact	LADO	LA procedures
Gorton Primary School	Bethan Irving	Alison Hyde	Bethan Irving & Anne Brady	Manchester	0161 234 5001	Manchester Safeguarding Partnership: Allegations management / Designated Officer (manchestersafeguardingpartnership.co.uk)	greatermanchesterscp.trixonline.co.uk
St James Primary School	Ken Corrall & Claire Thomas	Lisa Harvey	Claire Thomas & Ken Corrall	Manchester	0161 234 5001	Manchester Safeguarding Partnership: Allegations management / Designated Officer (manchestersafeguardingpartnership.co.uk)	greatermanchesterscp.trixonline.co.uk
St Barnabas	Cheryl Nelson	Emily Kirk	Beth Ostell & Cheryl Nelson	Manchester	0161 234 5001	Manchester Safeguarding Partnership: Allegations management / Designated Officer (manchestersafeguardingpartnership.co.uk)	greatermanchesterscp.trixonline.co.uk
Flixton Girls School	Danielle Tedford	Tara O'Halloran	Danielle Tedford, Nicki Wilson, Heidi Lockett, Kayleigh	Trafford	Trafford Children's First Response (egovhub.net)	Allegation of professional abuse (egovhub.net)	greatermanchesterscp.trixonline.co.uk

School	Principal	DSL	DDSL	LA	CSC contact	LADO	LA procedures
			Tighe, Nicola Fox & Stacey Kavanagh				
St Hilda's	Helen Plant	Val Beaumont	Hazel James	Trafford	Trafford Children's First Response (egovhub.net)	Allegation of professional abuse (egovhub.net)	greatermanchesterscp.trixonline.co.uk
Knowsley Lane	Linda Lord	Sue Whittle	Linda Lord	Knowsley	knowsley.gov.uk (children, young people and families: child protection and safeguarding)	knowsleyscp.org.uk/professionals/local-authority-designated-officer-lado/	knowsleyscp.org.uk
Willow Tree	Emma Riley	Elaine Wilkinson	Emma Riley	Knowsley	knowsley.gov.uk (children, young people and families: child protection and safeguarding)	knowsleyscp.org.uk/professionals/local-authority-designated-officer-lado/	knowsleyscp.org.uk
SS Simon's	Jill Ashmore	Jill Ashmore	Rebecca Mort	Bolton	boltonsafeguardingchildren.org.uk/worried-child	bolton.gov.uk: Local Authority Designated Officer (LADO) five minute facts	boltonsafeguardingchildren.org.uk
St Augustine's	Emma Dilworth	Emma Dilworth	Rebecca Hanlan-Jones & Daniel Hurst	Salford	safeguardingchildren.salford.gov.uk/professionals/	safeguardingchildren.salford.gov.uk: Salford LADO resource	safeguardingchildren.salford.gov.uk/professionals/policies-and-procedures/
St Paul's	Victoria Walton	Victoria Walton	Rob Cosgrove	Salford	safeguardingchildren.salford.gov.uk/professionals/	safeguardingchildren.salford.gov.uk: Salford LADO resource	safeguardingchildren.salford.gov.uk/professionals/policies-and-procedures/

Appendix 6: Pupils Who Abscond

Vantage CE Academies Trust is committed to ensuring the safety and welfare of all pupils at all times. In the event that a pupil absconds from school or a supervised activity, immediate action will be taken to locate the pupil and ensure their safety. The following procedure must be followed by all staff.

Definition of absconding

A pupil is considered to have absconded if they leave the school premises, or a supervised off-site activity, without permission and without being accompanied by an authorised adult.

Immediate actions: on-site absconding

1. Notify a senior leader and the DSL/DDSL immediately.
2. Conduct a thorough and swift search of the school grounds, including toilets, corridors, classrooms, playgrounds and any known hiding places.
3. Secure all exits and check CCTV, if available, to identify the direction in which the pupil may have gone.
4. Check with the pupil's friends and staff for any indication of where they might have gone or why.

Immediate actions: off-site or confirmed absconding

1. Call 999 immediately if the pupil is believed to be at risk of harm, in danger, or their whereabouts are unknown. Provide the pupil's name, description, clothing and last known location.
2. Inform the Principal and DSL/DDSL without delay.
3. Contact the child's parents or carers as soon as possible to inform them of the situation and to confirm whether the pupil has returned home.
4. If the pupil has known vulnerabilities (for example SEND, social worker involvement, an EHCP, or known risk behaviours), notify social care and any relevant external agencies.

Once the pupil is located

1. Ensure the pupil receives immediate pastoral and safeguarding support.
2. Conduct a return-to-school conversation led by a senior leader or the DSL to understand the reason for absconding, assess any underlying safeguarding or mental health concerns, and put a safety and support plan in place.
3. Inform all relevant staff (for example the SENCO, class teacher or mentor) of necessary actions or support adjustments.
4. Record the incident clearly on CPOMS, including the timeline of actions taken, names of staff involved, and outcomes and next steps.
5. Review the pupil's risk assessment and update it as required.

Ongoing considerations

- Repeat absconding may indicate unmet safeguarding needs or emotional distress.
- If applicable, consider a Family Help or early help assessment, or referral to external services.
- The DSL should liaise with relevant professionals (for example the social worker, SEND team or mental health lead).

A written incident report must be completed and stored securely in line with safeguarding record-keeping proto