Coombe Wood School

Safeguarding Policy and Procedures

Coombe Wood School is part of the Greenshaw Learning Trust.
The Greenshaw Learning Trust is a charitable company limited by guarantee registered in England and Wales, company number 7633694, registered at Greenshaw Learning Trust, ORU Sutton, Throwley Way, Sutton, SM1 4AF.

Policy Title	Safeguarding Policy & Procedures	
Category	Common School Policy	
Responsible Officer	CEO & GLT Head of Safeguarding	
Approved on	01 July 2026	
Minor technical or operational updates made	Name	Date
Review Cycle and next approval date	Annual - September 2027	
Monitoring arrangements	This policy will be reviewed annually, or sooner if required by statutory guidance updates. At every review, it will be approved by the Board of Trustees of the Greenshaw Learning Trust. The implementation of this policy will be reviewed annually by the Headteacher.	
Associated Policies *Internal Policy Library* *Published GLT Policies* *For school policies please visit the school website*	● GLT Student Welfare Statement ● School Behaviour Policy and Procedures ● School Attendance Policy ● School Relationships and sex education policy ● GLT Health and Safety Policy and Procedures ● GLT Information Security Policy, Data Protection and Data Retention Policy ● GLT and School Complaints Procedures ● GLT Staff Code of Conduct ● GLT HR, Recruitment and Selection, and disciplinary policies and procedures ● GLT Staff Whistle-blowing Policy. ● GLT Guidance on Visitors to School Sites ● GLT Volunteer Guidance ● GLT Positive Handling and Restrictive Physical Intervention Policy ● GLT Allergy Policy	
This Policy is based on or takes into account the following legislation and guidance	See Appendix 4. (Legislation and statutory guidance)	

Safeguarding Policy & Procedures

The Safeguarding and Child Protection Policy and Procedures for Coombe Wood School

PART A **6**

Important contacts - Trust 6

Important contacts - School 6

Scope & Applicability 6

PART B - Policy Statement **7**

Definitions 9

Terminology 10

3. Roles and responsibilities **11**

3.1 The Board of Trustees 11

3.2 The CEO 11

3.3 The GLT Head of Safeguarding 12

3.4 The Headteacher 13

3.5 The School Designated Safeguarding Lead (DSL) 14

3.6 All staff 16

4. Confidentiality **17**

5. Complaints and concerns about school safeguarding policies **18**

5.1 Complaints against staff 18

5.2 Other complaints 18

5.3 Whistle-blowing 18

Part C1 - Procedures for recognising abuse and taking action **19**

6.1 If a child makes a disclosure to you 19

6.2 If you believe a child is suffering or likely to suffer harm, or in immediate danger 20

6.3 If you discover that FGM has taken place or a pupil may be at risk of FGM 20

6.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger) 21

6.5 If you are concerned about a child who you think may be vulnerable to being drawn into extremist activity 21

6.6 If you have a mental health concern about a child 22

6.7 If you have concerns about abuse made by pupils against other pupils (child on child harm) 22

6.8 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos 22

6.9 If you have concerns about a staff member, supply teacher, volunteer or contractor 23

Part C2 - Procedures for schools **24**

7.2 Online safety and the use of mobile technology 25

7.3 Notifying parents or carers of safeguarding concerns 27

7.5 Children with a social worker 28

7.6 Children in Care (CIC) (previously Looked After Children - LAC) 28

7.7 Record-keeping 29
7.8 Information Sharing 30
7.9 Training 31
7.9i All staff 31
7.9ii The DSL and [deputy/deputies] 31
7.10 Recruitment and selection of staff and volunteers 32
7.11 Staff who have contact with children and families (Early Years Providers) 32
7.12 Guidance for Visitors to the School Site & Volunteers 32
Section D: further information and guidance regarding specific safeguarding issues 33
D.1. Children absent or missing from education 33
D.2. Child criminal exploitation 33
D.3 Child sexual exploitation 34
D.4 Child-on-child abuse (including harassment and violence) Misogyny and Harmful Sexual Behaviour (HSB) 35
D.5. Self-generated intimate images and/or videos (including those generated, altered, manipulated, or simulated using Artificial Intelligence (AI) and deepfake technology). 38
D.6. Domestic abuse 39
D.7. Homelessness 40
D.9. So-called 'honour-based' abuse (including FGM and forced marriage) 41
D.10. Marriage 42
D.11. Preventing radicalisation 42
D.12. Sexual violence and sexual harassment between children in schools 44
D.13 Serious violence 45
D.14. Checking the identity and suitability of visitors 45
Appendix 1: types of abuse 47
Appendix 2: allegations of abuse made against staff/low-level concerns 49
Section 1: allegations that may meet the harms threshold 49
Section 2: concerns that do not meet the harm threshold/low level concerns 50
Appendix 3: Encompass – Supporting Children Affected by Domestic Abuse 52
Appendix 4. Legislation and statutory guidance 54
Appendix 5- Greenshaw Learning Trust Guidance for Safe Sleeping, Allergy Management, and Safer Eating in Early Years Settings. 56
1. Safe Sleeping Guidance 56
Sleep Environment & Setup 56
Supervision & Monitoring 56
2. Allergy Management & Law 56
Identification & Documentation 56
Food Preparation & Service 57
3. Safer Eating & Choking Prevention 57
Food Preparation Standards 57
Supervised Mealtimes in Early Years Settings 57

PART A

Important contacts - Trust

ROLE/ORGANISATION	NAME	CONTACT DETAILS
GLT CEO	Will Smith	wsmith@greenshawlearningtrust.co.uk
GLT Head of Safeguarding	Lydia Greenwood	lgreenwood@greenshawlearningtrust.co.uk
GLT Safeguarding Team	Stephen Derry/ Craig Weir	sderry@greenshawlearningtrust.co.uk cweir@greenshawlearningtrust.co.uk
Chair of Board of Trustees	Diana Barran	dbarran@greenshawlearningtrust.co.uk
Nominated Safeguarding & Child Protection Trustee	Diana Barran	dbarran@greenshawlearningtrust.co.uk
GLT Head of HR – lead for safer recruitment	Ross Dickerson	rdickerson@greenshawlearningtrust.co.uk

Important contacts - School

ROLE/ORGANISATION	NAME	CONTACT DETAILS
School Headteacher	Ms N. Williams	nwilliams@coombewoodschool.co.uk
School Designated Safeguarding Lead (DSL)	Mr C. Weir Mr A. Vass Ms C. Hutchinson	cweir@coombewoodschool.co.uk avass@coombewoodschool.co.uk chutchinson@coombewoodschool.co.uk
School Deputy DSL (DDSL)	Ms N. Williams	nwilliams@coombewoodschool.co.uk
Local Authority Designated Officer (LADO)	Mr S. Hall	lado@croydon.gov.uk
Designated Teacher for Children in Care	Ms C. Boateng	cboateng@coombewoodschool.co.uk

Scope & Applicability

- It is the responsibility of the Headteacher of each school, and the GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff follow this Policy and all Policies and Procedures across the Trust.
- If there is any question or doubt about the interpretation or implementation of this Policy, the 'Responsible Officer' or the GLT CEO should be consulted.
- Unless otherwise stated, all Policies apply to all schools within the Trust, all Trust employees (including temporary and agency staff), all pupils, all trustees and committee members (including members of community committees), all volunteers, and all visitors and contractors
- **This is a Common School Policy**. Common School Policies are where the Board of Trustees has determined that all schools in the Trust must follow the same Policy, so that the Trust can fulfil its statutory responsibilities and/or manage its schools effectively. Common school policies and procedures are approved by the Board of Trustees. Some will have a school-specific element or annex; in these cases each school's Headteacher will have tailored those specific parts of the policy/procedure – and those parts only, as indicated in the policy/procedure – to their specific requirements. All schools and services within the Trust must comply with Common School Policies, although an appendix may be applied locally.

PART B - Policy Statement

The Board of Trustees of the Greenshaw Learning Trust places the highest importance on its duty to safeguard and promote the welfare and safety of all children in its care.

The Trust believes that safeguarding and promoting the welfare of children is everyone's responsibility. The term 'child' or 'children' relates to anyone under the age of 18. Everyone who comes into contact with children and their families and carers has a role to play. The Trust is committed to safeguarding and promoting the welfare of children by the provision of a safe environment in which children can learn. The Trust recognises that safeguarding now includes protecting children from harmful online influences such as misinformation, disinformation, conspiracy theories, and inappropriate or unsafe use of generative artificial intelligence (AI). These issues will be addressed in staff training, curriculum planning, and online safety procedures. All people working with children and visiting school premises must be aware that children may be at risk of abuse, neglect and exploitation are well placed to observe signs of abuse, have a duty to protect children from abuse, neglect and exploitation and have a responsibility to identify and report child welfare concerns and take appropriate action, acting on concerns about a child's welfare immediately, in association with other Trust staff and volunteers, visitors, families and other agencies.

All Trust staff and volunteers have a responsibility to provide a safe environment in which children can learn and should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child and fulfil their legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm.

The Trust recognises that all schools also play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by the school's:

- Behaviour policy and procedures
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly in an age appropriate context
- The Trust will annually review filtering, monitoring and cyber-security arrangements to ensure that its cyber-security provision meets the latest DfE standards. (DFE's Plan Technology for your school self assessment tool) https://www.gov.uk/guidance/plan-technology-for-your-school

Safeguarding and promoting the welfare of children is defined for the purposes of this Policy as:

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

Children includes everyone under the age of 18 (Education Act 2002 and Children Act 1989) and those children above the age of 18 who are on the school roll.

The Trust and its schools will recognise that some children have an increased risk of abuse, neglect and exploitation and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We will ensure that all children have the same protection, regardless of any barriers they may face.

The Trust and its schools will give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are repeatedly being removed from the classroom
- Are on an Adapted Timetable.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

- Are at risk due to either their own or a family member's mental health needs
- Are Children in Care
- Are missing from education
- Have unexplainable and/or persistent absences from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

The Trust and its schools will ensure that children feel safe and comfortable to come forward and report any concerns and/or allegations through:

- Having systems in place for children to confidently report abuse and ensuring that their views are taken into account
- Ensuring reporting systems are well promoted, easily understood and easily accessible for children
- Making it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

The Trust and its schools recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under the behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

This Policy and Procedures also apply to extended school and off-site activities including the safeguarding of children who attend Alternative Provisions.

Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
Contextual Safeguarding The approach to understanding and responding to young people's experiences of significant harm beyond their families.
Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
Exploitation is when someone uses a child for financial gain, sexual gratification, labour or personal advantage.
Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.
Children includes everyone under the age of 18.
The following **three safeguarding partners** are identified in Keeping Children Safe in Education. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- An integrated Care Board (ICB) within the LA area
- The chief officer of police for a police area in the LA area

This policy is consistent with the procedures of the three safeguarding partners.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Terminology

- The Trust means the Greenshaw Learning Trust (GLT).
- School means a school or academy within the Greenshaw Learning Trust.
- Headteacher means the headteacher, executive headteacher or principal of the school/academy.
- CEO means the chief executive officer of the Greenshaw Learning Trust.
- Trust Shared Service means the services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a school Headteacher. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher should be read as the GLT CEO.
- Governance Colleague means a Trustee or Community Governance Committee (CGC) member.

- Responsible Officer means the member of the Director Team to which responsibility for the management of the policy, procedure or statement has been delegated by the Board of Trustees
- Policy or Policies should be read as including any procedures, reports, templates, models, statements and schedules etc. as specified in the GLT Policy Schedule. Categories of Policy are defined in 'Scope and Applicability'
- **The DSL** means Designated Safeguarding Lead of the School.
- **DDSL** means the Deputy Designated Safeguarding Lead of the School.
- **Staff** means paid and unpaid staff with a contract of employment with the Trust.
- **Volunteer** means volunteers working in Trust premises or with children on the roll of a Trust school under some form of agreement with the Trust or school; volunteers are covered by the category of 'staff' unless explicitly stated.
- **Visitors** means casual visitors to and users of the Trust premises, including people working with children on a voluntary basis not covered by the category of formal 'volunteer'
- **Contractors** means people working in Trust premises under a formal contract with an external organisation.

For services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a Headteacher, references to 'school' should also be read as 'the Trust Shared Service', 'Headteacher' should be read as the 'GLT CEO' and DSL should be read as the GLT Head of Safeguarding.

3. Roles and responsibilities

3.1 The Board of Trustees

The Board of Trustees will

- Have strategic responsibility and oversight of Safeguarding across Greenshaw Learning Trust.
- Work with the CEO to ensure that safeguarding is central to the Trust's strategy and development plans.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO ultimately to account for its implementation, and to Headteachers for its implementation within GLT schools.
- Ensure there is an annual review and approval cycle of safeguarding policies and procedures.
- Be informed of all statutory guidance, complete all required safeguarding training and be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements.
- Appoint a Link Trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees.
- Facilitate a Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Ensure that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

- Receive and consider reports from the CEO/Head of Safeguarding relating to significant safeguarding concerns, actions, trends and outcomes.
- Receive the annual safeguarding report for the Trust, and note any actions arising from it.

3.2 The CEO

The GLT CEO is responsible for ensuring that this policy is adhered to across all schools and by Trust Shared Service. The GLT CEO will:

- Ensure that the Scheme of Delegation is clear around the responsibilities for safeguarding at all levels.
- Report significant safeguarding concerns to the Chair of the Board of Trustees
- Commission external challenge and support where appropriate to ensure the Trust is meeting its statutory responsibilities in respect of safeguarding and promoting the welfare of children.
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer of the Trust Shared Service or a Headteacher (see appendix).
- Make decisions on all low-level concerns regarding members of staff or volunteers of the Trust Shared Service or Headteachers.
- Ensure the Trust Shared Service Single Central Record is maintained and accurate; spot checks may be delegated to the Head of Safeguarding if appropriate.
- Ensure that safeguarding policies and practice are regularly reviewed in light of the latest KCSIE updates, including increased focus on harmful online behaviour and serious violence.

The GLT CEO may delegate as appropriate to the GLT Head of Safeguarding and/or the GLT Safeguarding Team.

3.3 The GLT Head of Safeguarding

The GLT Board of Trustees has appointed the GLT Head of Safeguarding as the Strategic Lead for Safeguarding across GLT and the Lead DSL.

The GLT Head of Safeguarding will:

- Provide advice and support to Trust Shared Service Staff on child welfare and child protection matters and keep the CEO informed of any issues.
- Review and update the GLT Safeguarding Policy at least annually and more frequently if required by changes to KCSIE ensuring all relevant adults are aware of any changes.
- Ensure an accurate record and register of all School DSLs and their training is maintained.
- Oversee the completion of a Safeguarding Compliance Audit for each school in the Trust and any subsequent action plans.
- Complete a documented check of the SCR in each school.
- Provide development opportunities for the school DSLs and oversee the DSL Support Group Year Plan, determined by the new updates from KCSIE.

- Arrange training for school DSLs, delivered by a range of external providers and experienced DSLs from within Greenshaw Learning Trust.
- Ensure that all staff in the Trust Shared Service complete annual safeguarding and child protection training and update this regularly.
- Ensure that Trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated and receive ongoing training that equips them with the knowledge to provide strategic challenges.
- Ensure that all staff within the Trust Shared Service are informed of the systems which support safeguarding, including this policy, as part of their induction and understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Ensure that the Trust Shared Service follows procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). The appendix of this policy covers this procedure
- Ensure an annual safeguarding report is prepared and presented to the Board of Trustees.
- Maintain oversight of the Trust's response to child-on-child abuse, harmful sexual behaviours, and online safety incidents, ensuring that these are appropriately recorded, monitored, and addressed.

3.4 The Headteacher

The Headteacher of each school will ensure that:

- Staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- The DSL and other staff undertake appropriate safeguarding and child protection training.
- At least one member of an appointed recruitment panel will have undertaken appropriate safer recruitment training.
- The DSL is keeping up to date records of staff training.
- The school's Single Central Record is maintained and accurate, spot checks may be delegated to the DSL if appropriate.
- This policy is communicated to parents/carers when their child joins the school and via the school website.
- The DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- There are regular checks/ quality assurance on the recording of the rationale and decision making of the DSL.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.

- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 2 of this policy covers this procedure.
- They act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2).
- They make decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this. These decisions are stored in a secure area and remain confidential.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
    - The responsibility for safeguarding all children in Alternative Provision remains with the school. The HT will direct the DSL to attend meetings and work collaboratively with the provider ensuring nothing is missed.
- Safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- The 'GLT Guidance on Visitors to School Sites' and 'GLT Volunteer Guidance' is followed in their school including the updated volunteer requirement of enhanced DBS check and Barred List Checks through the removal of supervision exemption and the inclusion within regulated activity KCSIE 2026.
- The DSL is ensuring accurate records are kept within the child protection online monitoring system.
- The relevant staffing ratios are met, where applicable.
- Each child in the Early Years Foundation Stage is assigned a key person (primary only).
- A designated teacher is in place to support the educational achievement of children in care.
- Learners are taught about safeguarding within the curriculum in compliance with statutory guidelines.
- Ensure that the curriculum covers up-to-date safeguarding topics including online safety, mental health awareness, and the risks of misinformation, disinformation, and conspiracy theories as outlined in KCSIE 2026
- Oversee the CPD provided by the DSL for staff to ensure it proactively targets **online algorithmic radicalisation** (such as the spread of extreme misogynistic influencer narratives) alongside generative AI risks.
- Ensure that all staff promote an inclusive, anti-discriminatory culture within the school.

3.5 The School Designated Safeguarding Lead (DSL)

The School Designated Safeguarding Lead (DSL) will be a member of the school senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL can also be contacted out of school hours if necessary using the details above. When the DSL is absent, the Deputy DSL will act as cover.

The DSL will:

- Provide advice and support to other staff on child welfare and child protection matters and keep the Headteacher informed of any issues.
- Ensure that all staff undertake appropriate safeguarding and child protection training, at induction, through safeguarding updates and regular CPD. This includes training in online safety, and their role and responsibilities in relation to filtering and monitoring.
- Ensure all staff are aware of their local early help process and understand their role in it.
- Ensure all staff are aware of the process for the DSL making referrals to the local authority children's social care for statutory assessments under the Children ACT 1989 section 17 and section 47.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Ensure accurate records are kept within the child protection online monitoring system.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Ensure the successful transfer of the safeguarding/child protection file when a learner moves to a new setting within 5 days of transfer or the first 5 days of the start of a new term.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Inform the headteacher of any enquiries under section 47 of the children's act and any police investigations. This includes the awareness of the requirement that all children have an appropriate adult to support and help them in the case of a police investigation or search.
- Take the lead and responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that learners are experiencing or have experienced and identifying the impact that these issues may have on learners' attendance, engagement and achievement, and implementing targeted pastoral interventions to reduce these barriers to education.
- Record rationale around decision making including the decision not to make a referral.
- Use specific statutory language in all reporting on CPOMS and referrals made to other agencies.

- Ensure there is appropriate safeguarding cover during term time including out of hours activities run by the school.
- Take lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place.
- Ensure the curriculum and staff continuous professional development (CPD) proactively target **online algorithmic radicalisation** (such as the spread of extreme misogynistic influencer narratives) alongside generative AI risks
- Maintain awareness of updated KCSIE guidance on child-on-child abuse, including identifying, responding to, and preventing harmful sexual behaviours and serious violence.
- Ensure training includes understanding of the impact of domestic abuse, mental health concerns, and risks associated with modern technology and social media.
- Complete Termly checks of the schools SCR with documented outcomes.

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

3.6 All staff

All staff across GLT will recognise that safeguarding and promoting the welfare of children is everyone's responsibility and:

- In absolute compliance with KCSIE 2026, GLT enforces a universal safeguarding literacy baseline; all Trust personnel including catering, premises and administration teams, full-time, part-time, temporary, supply, Governance Colleagues and non-instrustional staff must read and comprehend Part One of Keeping Children Safe in Education 2026 in its entirety. This will be recorded on the Trust/ School's Single Central Record.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will ensure that they understand:

- The school and Trust systems which support safeguarding, including this Child Protection and Safeguarding Policy, and any local procedures according to their place of work
- The GLT Staff Code of Conduct,
- The role and identity of the designated safeguarding lead (DSL) and [deputy/deputies] of either the school (School Staff) or the Head of Safeguarding for the Trust (Trust Shared Service Staff)
- The Behaviour Policy and Behaviour Procedures as relevant to their place of work
- Family Help multi-agency support (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality
- The signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE),

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

- All staff will recognise Racism, Faith Based Discrimination and other Discriminations as harm in it's own right
- How to identify vulnerable learners and what action to take to keep them safe, including learners who may benefit from early help intervention
- How to ensure that information or concerns about learners will be shared with the DSL, including recording concerns appropriately and in a timely manner using the online child protection system.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online (contextual safeguarding)
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children.
- All staff will recognise Racism, Faith Based Discrimination and other Discriminations as harm in it's own right
- What to look for to identify children who need help or protection
- The additional safeguarding risks highlighted in KCSIE, including the impact of misinformation and disinformation, mental health, and increased risks posed by online environments and social media platforms

4. Confidentiality

All staff should understand that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, although in most circumstances data will not be shared unless a data release form is completed.
- The Data Protection Act (DPA) and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- DSLs and staff should also be aware of the updated guidance regarding the sharing of information around serious violence and the potential safeguarding implications.

Regarding anonymity, all staff will:

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Understand that there may be times when it is necessary to share information without consent such as when:
    - To gain consent would place the child at risk
    - To gain consent would compromise a criminal investigation
    - It cannot be reasonably expected to gain consent
- Know that there is no obligation for a school to disclose the information to the police that could incriminate a person in an offence but that it is an offence to knowingly impede the apprehension of a person who is committing an arrestable offence. The DSL will work with the police, child and parents (if relevant) to ensure information is disclosed in a timely but informed manner
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- Speak to the DSL (or DDSL) if they are in any doubt about sharing information

Specifically, the DSL should understand that:

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Parents or carers should normally be informed of a safeguarding concern (unless this would put the victim at greater risk)
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- They should consider the government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and support staff who have to make decisions about sharing information

In the serious harm test under data protection legislation, there are occasions where a child's data will not be shared - in such circumstances the DSL will seek legal advice or contact the GLT Head of Safeguarding.

Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff in the appendix.

5. Complaints and concerns about school safeguarding policies

5.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation are handled in accordance with procedures for dealing with allegations of abuse made against staff (see appendix).

5.2 Other complaints

In the first instance, other complaints should be made through either the School or Trust Complaints Procedures, as appropriate.

5.3 Whistle-blowing

Details of Staff Whistle-blowing procedures can be found in the GLT Staff Whistle-blowing Policy.

Part C1 - Procedures for recognising abuse and taking action

All paid and unpaid staff, Governance Colleagues and volunteers, and all contractors and other people using or visiting any of the premises of the Trust or its schools must follow the procedures set out below in the event that they have a safeguarding concern.

Please note – throughout these Procedures you should take any references to the DSL to mean the School Designated Safeguarding Lead (and DDSL to mean the School Deputy Designated Safeguarding Lead) . For Trust Shared Service staff, DSL should be read as Head of Safeguarding. In all circumstances inform the DSL of any safeguarding concerns at the earliest opportunity and in their absence the DDSL or a member of the Safeguarding team.

6.1 If a child makes a disclosure to you

You should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Inform the DSL at the earliest opportunity or in their absence the DDSL or a member of the Safeguarding team.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Record all information on the child protection online monitoring system. These recordings should include all concerns, discussions and decisions made including the rationale for those decisions.
- Bear in mind that some children may:
    - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
    - Not recognise their experiences as harmful
    - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

  But none of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.
- Ensure that any concerns related to online harm, such as exploitation via social media or gaming platforms, are reported promptly and escalated appropriately.
- Take extra care to follow procedures when concerns relate to children with disabilities or special educational needs, recognising the increased vulnerability.

6.2 If you believe a child is suffering or likely to suffer harm, or in immediate danger

You should:

- Inform the DSL at the earliest opportunity. In their absence inform the DDSL or a member of the Safeguarding team.
- If you are unable to contact the DSL, DDSL or member of the safeguarding team, you are able to make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.
- Tell the DSL as soon as possible if it is essential you make a referral directly.
- Follow your local procedures for making a referral, as per the arrangements put in place by the three safeguarding partners or use the following link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

6.3 If you discover that FGM has taken place or a pupil may be at risk of FGM

You should:

- Inform the DSL at the earliest opportunity or in their absence the DDSL or a member of the Safeguarding team, who will support you to report this to the police.
- Understand that a member of staff who either is informed by a girl under 18 that an act of FGM has been carried out on her or observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally.
- Understand that this is a mandatory statutory duty, and staff will face disciplinary sanctions for failing to meet it.
- Then also inform the DSL who should involve children's social care (unless you have been specifically told by the police not to disclose).

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

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

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

6.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

You should:

- Where possible, inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the wider safeguarding team, or senior leadership team, and/or take advice from local authority children's social care or contact the GLT DSL. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.
- If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- If you need to make a referral directly, you must tell the DSL as soon as possible.
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

6.5 If you are concerned about a child who you think may be vulnerable to being drawn into extremist activity

You should:

- If a child is not suffering or likely to suffer from harm, or in immediate danger, inform the DSL at the earliest opportunity or in their absence the DDSL or a member of the Safeguarding team.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team.
- If necessary, make a referral to local authority children's social care directly. Inform the DSL or deputy as soon as practically possible after the referral.

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

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

Further information: Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include, if the individual gives consent, Channel, the government's programme

for identifying and supporting individuals vulnerable to being drawn into terrorism, or the local authority children's social care team. Help is to be provided to meet the needs of the children as soon as problems emerge.

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

6.6 If you have a mental health concern about a child

You should:

- Raise your concern with the DSL, and if appropriate the relevant pastoral staff member including the attendance officer if attendance is impacted.
- Understand 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. That mental health concerns such as self-harm, eating disorders and suicidal ideation must not be treated as isolated issues and must be treated as potential safeguarding indicators.
- Take immediate action (as above) if you have a concern about a child's mental health that is also a safeguarding concern.
- Seek support from emergency services, via 999, if the learner is at risk of immediate harm.

6.7 If you have concerns about abuse made by pupils against other pupils (child on child harm)

You should:

- Inform the DSL at the earliest opportunity, or in their absence the DDSL or a member of the Safeguarding team.
- Record the allegation on the online system.
- Know that it is not your responsibility to investigate it.

6.8 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos

(recognised as consensual or non-consensual self generated images and/or videos, including those generated, altered, manipulated, or simulated using Artificial Intelligence (AI) and deepfake technology)

you should:

- Inform the DSL at the earliest opportunity. In their absence the DDSL or a member of the Safeguarding team.
- Explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

You must NOT:

- View, copy, print, share, store or save the imagery yourself (unless the DSL has requested your support with doing this - for example if you are a member of the IT team).
- Ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

6.9 If you have concerns about a staff member, supply teacher, volunteer or contractor

You should:

- Understand that if these concerns are that a criminal offence against or related to a child may have been committed or that a person may not be suitable to work with children, or has behaved in a way that indicates they may pose a risk of harm to children, this must be reported urgently and should not be discussed with the individual it concerns.

    - If the concerns/allegations are about a member of school staff other than the Headteacher, this must be reported to the Headteacher.
    - If the concerns/allegations are about the Headteacher or are about a member of Trust Shared Services staff, this must be reported to the GLT CEO.
    - If the concerns/allegations are about the CEO, this must be reported to the Chair of the Board of Trustees.
    - If you feel there is a conflict of interest in reporting a concern or allegation about a member of staff to the appropriate person within GLT, it can be escalated to the next appropriate person or can be reported directly to the local authority designated officer (LADO).

Where appropriate, the Headteacher / CEO will ensure that the LADO is informed of the allegation and appropriate actions are taken within the necessary timescale (see appendix for more detail). Preliminary internal investigations must not delay the initial external notification to the LADO.

If the concern is about a member of staff, volunteer or contractor in a school you should take any references to the DSL to mean the School Designated Safeguarding Lead (and DDSL to mean the School Deputy Designated Safeguarding Lead). In all circumstances inform the School DSL of any safeguarding concerns at the earliest opportunity and in their absence the School DDSL or a member of the School Safeguarding team.

If the concern is about a member of staff, volunteer or contractor of the Trust Shared Service you should take any references to the DSL to mean the GLT Head of Safeguarding. In all circumstances inform the GLT Head of Safeguarding of any safeguarding concerns at the earliest opportunity and in their absence the GLT CEO.

Part C2 - Procedures for schools

Please note: Headteachers must ensure that the procedures set out in sections 7.1 - 7.6 below are followed in their schools.

7.1 Children attending Alternative Provision

GLT is committed to ensuring that all pupils, regardless of their place of education, are safe, supported, and provided with a high-quality educational experience. In line with KCSIE 2025, GLT continues to strengthen all practices around Alternative Provision, ensuring robust safeguarding is at the heart of all decisions.

Safeguarding in Alternative Provision Settings (In line with KCSIE 2025)

This section outlines the responsibilities for safeguarding pupils who are placed in Alternative Provision (AP), in line with the statutory guidance set out in *Keeping Children Safe in Education (KCSIE) 2025*. It aims to ensure the safety, well-being, and educational quality for all students, including those who are educated off-site.

Alternative Provision refers to education arranged by local authorities or schools for pupils who, because of exclusion, illness, or other reasons, would not otherwise receive suitable education. This can include part-time placements, managed moves, or placements in specialist settings for behavioural or medical needs.

A. Responsibilities of the School or Setting

The Headteacher and Designated Safeguarding Lead (DSL) have clear responsibilities under KCSIE when commissioning and managing Alternative Provision placements:

Before Placement

- Carry out thorough due diligence on the AP provider. This includes:
    - Safeguarding policies and procedures.
    - Safer recruitment practices.
    - Availability of a trained DSL.
    - Health and safety arrangements.
    - Insurance and risk assessments.
- Ensure written agreements are in place outlining:
    - Roles and responsibilities.
    - Communication protocols.
    - Reporting processes for safeguarding or welfare concerns.

The school will obtain written confirmation of safeguarding checks for all AP staff, be notified of staffing changes, track pupil location including subcontracted sites, and review placements at least half-termly, ending placements if safeguarding cannot be assured.

During Placement

- Maintain frequent contact with the pupil, with regular documented welfare check-ins.
- Monitor the pupil's attendance, behaviour, engagement, and well-being.
- Conduct termly reviews of the placement, involving the pupil and parents/carers where appropriate.
- Ensure the AP provider promptly reports any safeguarding concerns to the commissioning school's DSL and/or local authority as appropriate.

B. Designated Safeguarding Lead (DSL) responsibilities

The DSL remains ultimately responsible for safeguarding all pupils, including those placed in AP.
The DSL Must maintain a clear safeguarding record of each pupil in AP, updated with any relevant concerns or incidents.
The DSL Must liaise with the AP DSL (if applicable) and ensure appropriate referrals are made if concerns arise.

C. Record Keeping and Monitoring

All safeguarding concerns, placement reviews, and communication with the AP provider must be accurately logged and retained in line with our safeguarding recording systems. This will be reviewed as part of regular school safeguarding audits.

D. Staff Training

All staff involved in commissioning, monitoring, or supporting pupils in Alternative Provision will receive specific training on the latest KCSIE requirements, including understanding risk factors, trauma-informed practice, and maintaining effective communication with AP settings.

E. Voice of the Child

Pupils placed in AP must be regularly consulted on their experience, safety, and support needs. Staff must ensure the pupil feels heard and supported, with appropriate action taken where concerns are raised.

7.2 Online safety and the use of mobile technology

Technology is a significant component in many safeguarding and wellbeing issues. In order to safeguard children from potentially harmful and inappropriate online material, the Headteacher will ensure that the school:

- Operates as a mobile phone free environment for all children.
- Has robust processes in place to ensure the online safety of children, staff, and volunteers

- Protects and educates the whole school community in its safe and responsible use of technology, including mobile and smart technology.
- Sets clear guidelines for the use of mobile phones for the whole school community.
- Establishes clear mechanisms, including the Smoothwall monitoring system. Smoothwall provides filtering and monitoring between 7am and 6pm during term time, to identify, intervene in and escalate any incidents or concerns, where appropriate. These concerns are linked to the schools online child protection reporting system. Filtering and monitoring will be assessed using the DfE 'Plan Technology for Your School' tool, and cyber security measures will meet DfE standards.
- The school's filtering and monitoring systems are reviewed at least once every academic year and written records of these checks are kept. The check will be completed by the member of Senior Staff who is responsible for filtering and monitoring within the school.
- Educates children about online safety as part of the curriculum. For example:
    - The safe use of social media, Artificial intelligence, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Trains staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, artificial intelligence and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Trains staff to recognise and respond to harmful content including misinformation, disinformation, conspiracy theories, and risks arising from the misuse of generative AI.
- Ensures staff understand the role of filtering and monitoring systems in keeping children safe.
- Educates parents/carers about online safety and shares clear procedures with them so they know how to raise concerns about online safety.
- Ensures staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- Ensures staff are aware of the link between cyber security and safeguarding risks.
- Ensures all staff, children and parents/carers are aware that staff have the power to search children's phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Uses the GLT preferred filtering and monitoring systems to limit children's exposure to the 4 key categories of risk from the school's IT systems.
- The Trust will stay informed about emerging online risks, new platforms, and digital trends, updating safeguarding approaches accordingly.

The DSL has oversight of and monitors the school's filtering and monitoring systems and ensures that they are linked to the online child protection system. Filtering and monitoring systems are reviewed annually by the DSL. The DSL is responsible for staff training, which includes training on staff roles and responsibilities in relation to filtering and monitoring.

The GLT Head of Safeguarding and school DSL must conduct and document an annual review of the effectiveness of the schools filtering and monitoring systems. This will form part of the annual Safeguarding

Audit. The review must explicitly evaluate the infrastructure's capability to detect and block access to generative AI tools capable of creating harmful, sexualised, or defamatory deepfake content.

The 4 key categories of risk
The approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

7.3 Notifying parents or carers of safeguarding concerns

The DSL will determine whether it is appropriate for any concerns about a child to be discussed with the child's parents or carers, or other appropriate persons.

The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If notifying the parents or carers could increase the risk to the child, the concern will be discussed with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, the parents or carers of all the children involved will usually be notified by the DSL if appropriate and safe to do so. This will be in conjunction with the police and/or local authority children's social care to make sure the approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis) implement and share a safety plan for all parties involved in the incident.

7.4 Children with special educational needs, disabilities or health issues

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.

- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

When required, the Headteacher will ensure that their school provides additional pastoral support for these children, including helping children overcome any communication barriers they face. Any abuse involving children with SEND involves close liaison between the DSL (or deputy) and the SENCO.

7.5 Children with a social worker

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The Headteacher, the DSL and all members of staff will work with and support social workers to help protect vulnerable children.

If a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare and educational outcomes. For example, it will inform decisions about suspensions from school, and responding to unauthorised absence or missing education where there are known safeguarding risks and the provision of pastoral and/or academic support.

If a DSL wishes to raise concerns regarding the child's social worker, this should be escalated through the relevant local authority.

7.6 Children in Care (CIC) (previously Looked After Children - LAC)

The designated teacher in each school will ensure that staff have the skills, knowledge and understanding to keep Children in Care safe. In particular, appropriate staff will have relevant information about children's legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The designated teacher will have details of children's social workers and relevant virtual school heads.

The designated teacher is responsible for promoting the educational achievement of children in care in line with statutory guidance.

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

As part of their role, the designated teacher will:

- Work closely with the DSL and wider Safeguarding Team to ensure that any safeguarding concerns regarding children in care are quickly and effectively responded to.
- Work with Virtual School Heads to promote the educational achievement of children in care, including discussing how pupil premium plus funding can be best used to support children in care and meet the needs identified in their personal education plans.
- The Designated Teacher will work with the Virtual School Head to promote the educational achievement of Children in Care and, in line with non-statutory guidance, children in kinship care arrangements."

Please note:

- ***The Headteacher must ensure that the procedures set out are followed in their school.***
- ***The GLT CEO must ensure that the procedures set out are followed in the Trust Shared Service (for Headteacher read CEO, for DSL read Head of Safeguarding).***

7.7 Record-keeping

The Headteacher will ensure that all safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded in writing.
Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- The decision making process including How and Why the outcome for action/ intervention was reached. Rationale is to be included even if the decision was not to refer.

The DSL will review information entered by all staff on the online monitoring system.
The DSL will provide robust training at least annually with regards to reliable recording and information sharing.

Concerns and referrals, either electronic or paper, will be kept in a separate child protection file for each child.

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
The DSL must conduct a direct, verbal DSL to DSL telephone or secure video consultation with the receiving schools DSL. THis consultation must occur **before** the child's first day of attendance at the new setting to ensure contextual risk nuances and safety plans are maintained seamlessly.

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

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

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

The DSL will use the CPOMS GLT categories when recording a concern.
School records on CPOMS that feed into data collection for the MAT wide safeguarding program meet the requirements for confidentiality.
The DSL has the responsibility of ensuring staff who allocate GLT categories have a clear understanding of the definition for each category to enable representative and valid data to be collected.
The DSL is responsible for ensuring clarity in reporting and statutory thresholds. This policy recognises and applies strict legal definitions set out in the Sexual Offences Act, specifically seperating sexual assault from sexual assault by pentration, ensuring that referrals to external agencies (Police/ Children's services) utilise accurate statutory language.

7.8 Information Sharing

Information is shared with other agencies in line with local safeguarding procedures and the GLT Data Protection Policy.

Records are stored and retained in line with the GLT Information Security Policy and the GLT Data Retention Policy

Information sharing is guided by following the 7 Golden Rules as defined in DFE Information sharing advice May 2024.

1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person (s) failing to protect them.
2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer (s), and explain who you intend to share the information with, what information you will be sharing and why.
3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.
4. Seek advice promptly from the DSL whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.
5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g the child, a carer, a

neighbour, or a colleague) who might suffer if their details become known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in Safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.
7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.

7.9 Training

7.9i All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety. Training will address the dangers of misinformation, disinformation, conspiracy theories, and harmful online challenges. Content of this training will ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the three safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers manage behaviour effectively to ensure a good and safe environment and have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, at least every two years to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training.

7.9ii The DSL and [deputy/deputies]

The DSL and [deputy/deputies] will undertake child protection and safeguarding level three training at least every 2 years. This is provided by the Local Authority to ensure it includes information on local contextual safeguarding. The DSL will use a contextual safeguarding approach gained through relevant training to understand and respond to risks beyond the school environment and within their school community. The DSL and/or the DDSL will attend the annual GLT Safeguarding conference and termly Trust Network meetings.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). The DSL will read (and share with the appropriate school staff) the GLT termly safeguarding bulletin and access further training though the school improvement safeguarding lead.

They will also undertake Prevent awareness training.

7.10 Recruitment and selection of staff and volunteers

In the recruitment and selection of staff and volunteers Greenshaw Learning Trust will at all times adhere to Greenshaw Learning Trust Recruitment and Selection policies and procedures, and to Keeping Children Safe in Education. At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This training will cover, as a minimum, the contents of Keeping Children Safe in Education. For more information about safer recruitment procedures please refer to the GLT Safer Recruitment Policy.
GLT will use the DfE's 'Check a teacher's record' service and GOV.UK guidance for Section 128 checks.
In all job descriptions a clear statement about the safeguarding responsibilities of the post holder will be included.
The risks of individuals' behaviours outside work, including online activity, and how this might impact safeguarding will be considered during the recruitment process.

7.11 Staff who have contact with children and families (Early Years Providers)

All Early Years staff who have contact with children and families will have line management which provides them with support, coaching and training, to promote the interests of children and allow for confidential discussions of sensitive issues.

7.12 Guidance for Visitors to the School Site & Volunteers

Headteachers should ensure that the GLT Guidance on Visitors to the School Site and GLT Volunteer Guidance is followed in their school. (Headteachers can access the Volunteer checklist through the GLT Safeguarding Intranet. This will provide a quality assurance tool around the new requirements for DBS and Barred List checks as specified in KCSIE 2026)

Section D: further information and guidance regarding specific safeguarding issues

Further information for all staff

D.1. Children absent or missing from education

A child who is absent from or missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. Attendance concerns will be assessed for safeguarding risk and escalated promptly in line with statutory duties.

There are many circumstances where a child may become absent or missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

The School Attendance Policy and Procedures for unauthorised absence and for dealing with children who are absent from or missing from education, particularly on repeat occasions, will be followed to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for, and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent or missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, child protection procedures will be followed, including with respect to making reasonable enquiries. An immediate referral to the local authority children's social care team, and the police, will be made, if the child is suffering or likely to suffer from harm, or in immediate danger.

D.2. Child criminal exploitation

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

something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. The School DSL will work in collaboration with multi agencies to provide additional support to help keep the child in education.

D.3 Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the child who has been harmed needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The child who has been harmed can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

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

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant
- If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

D.4 Child-on-child abuse (including harassment and violence) Misogyny and Harmful Sexual Behaviour (HSB)
Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two. GLT has a zero-tolerance approach to sexual violence and sexual harassment. Even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

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

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.
If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures as set out in this policy.

When considering instances of harmful sexual behaviour between children, their ages and stages of development will be considered. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will be offered appropriate support.
When identifying and managing harmful sexual behaviour (HSB) and child on child abuse, staff must not dismiss low level incidents. Staff must understand that unchecked, low level boundary pushing, hyper sexualised language, or digital harassment can rapidly escalate into severe physical and criminal abuse if let uninterrupted.

Process for managing incidents of child on child abuse:

- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and safety plan into place for all children involved (including the child who has been harmed, the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a child who has been harmed or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- Concerns about foster carers or anyone in a position of trust working or volunteering with children should be referred to the LADO by the DSL on the day that the allegation is reported. The setting should not undertake any investigation unless advised by the LADO.
- The school will ensure appropriate specialist support is available for victims and perpetrators, and liaise with external agencies as required to provide this support.
- Any online forms of child-on-child abuse, such as sharing of indecent images or online harassment, will be treated seriously and addressed promptly.
- Broad-spectrum misogyny and extreme online anit-women narratives are recognised by the Trust as distinct safeguarding indicators linked to HSB and radicalisation paths.
- The use of derogatory, misogynistic slurs, or the active promotion of extremist online influencers who demean women, must be formally recorded on CPOMS. This data must be reviewed by the DSL to assess the risk of wider contextual or child-on-child harm.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

Taking proactive action to minimise the risk of child-on-child abuse, and creating a supportive environment where the child who has been harmed can feel confident in reporting incidents is essential. To achieve this, Headteachers will ensure that curriculums help to educate pupils about appropriate behaviour and consent and pupils are able to easily and confidently report abuse.

And the Headteacher will ensure all staff:

- Are aware that child on child abuse includes discriminatory behaviour inclduing racism and faith targeted abuse.
- Are alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area
- Support children who have witnessed sexual violence, especially rape or assault by penetration and ensure the child who has been harmed, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- reassure the child who has been harmed that they are being taken seriously
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Are vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- Are aware that even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- Act immediately if they have any concerns about a child's welfare, rather than wait to be told
- Are aware that a child who has been harmed may not always make a direct report. For example: children can show signs or act in ways they hope adults will notice and react, or a friend may make a report, a member of staff may overhear a conversation or a child's behaviour might indicate that something is wrong.
- Recognise that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation. A pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Recognise the important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- Recognise that social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the child who has been harmed, the alleged perpetrator(s) and friends from either side
- Are aware of relevant safety plans/ risk assessments for the children that are regularly reviewed, shared with relevant parties and updated

Investigation and disciplinary action in response to child-on-child abuse

The DSL will take the lead role in any disciplining of the alleged perpetrator(s) and will provide support at the same time as taking any disciplinary action. Any sanctions will work alongside this, providing the necessary support for the alleged perpetrator (s). The rationale for the incident must demonstrate there has been a thorough investigation, there has been support put in place for all involved, the children have been educated

within the dangers of the situation and there have been appropriate sanctions put in place.
Investigate/Educate/Support and Sanction.
Disciplinary action (Sanctions) can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent schools from coming to their own conclusion about what happened and imposing a penalty accordingly. Matters will be considered on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution, liaising with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational to continue investigating about what happened while an independent investigation is ongoing

D.5. Self-generated intimate images and/or videos (including those generated, altered, manipulated, or simulated using Artificial Intelligence (AI) and deepfake technology).

Sexting is the consensual or non-consensual sharing of nude or semi-nude images/videos (formally known as 'sexting' or 'youth produced sexual imagery . This also includes images generated through the use of Artificial Intelligence.

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

- Whether there is an immediate risk to a child (Children)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the children involved which would influence risk assessment/ safety planning
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)

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

- The incident involves an adult
- There is reason to believe that a child has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13 years old

- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the child is presenting as suicidal or self-harming)

If none of the above applies then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks and they will hold interviews with the children involved (if appropriate).

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

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

Referring to the police
If it is necessary to refer an incident to the police, this will be done through the school's local arrangements.

Recording incidents
All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents including writing a clear rationale for all decisions made.

Curriculum coverage
As part of a broad and balanced curriculum children are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education [primary]/relationships and sex education [secondary] curriculums. This includes a more personalised or contextualised approach for vulnerable learners, including SEND children. The DSL works alongside the curriculum leader for PHSE to regularly review the curriculum and to consider contextual safeguarding issues within it.

D.6. Domestic abuse
Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. A child is a victim of domestic abuse if they see, hear or experience it.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/ adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't

physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

D.7. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
The DSL [and deputy/deputies] will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

D8. **Gender-Questioning Children**

All GLT schools approach the support of gender-questioning children primarily as a matter of child welfare, mental health tracking and safeguarding, aligning strictly with the principles outlined in the CASS Review and statutory updates.
While Greenshaw Learning Trust schools will never proactively initiate social transition, any formal request submitted by a student or parent will trigger a formal, documented risk assessment overseen by the DSL. This assessment will weigh the best interests of the child against the wider school community, assess mental health and bullying vulnerabilities, and ensure that no historical arrangements or new requests conflict with the absolute protection of biological sex-based spaces.
GLT schools will not initiate, encourage, or formalise social transition processes (including changes to names, pronouns, or uniform) without active parental engagement. Parents must be informed immediately if a child expresses a desire to change their gender identity at school, unless the DSL processes clear, documented evidence that doing so poses an immediate risk of significant harm to the child.
The Trust and its schools are legally required to record a child's biological sex accurately in all statutory admissions and attendance registers.

In accordance with health, safety and privacy protections as outlined in KCSIE 2026 single sex communal facilities- specifically toilets, changing rooms, showers and overnight residential accommodation- must remain strictly demarcated by biological sex.
Where a gender-questioning child requires support, individual- use/gender neutral facilities may be offered as an additional alternative, providing that doing so does not compromise the absolute protection and privacy of single-sex communal spaces for the wider school population.
Individual Safeguarding Risk Assessments will be conducted to balance the rights and safety of all children, ensuring documented decision-making and appropriate parental engagement.

D.9. So-called 'honour-based' abuse (including FGM and forced marriage)
So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM
The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.
Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs
- Potential signs that a pupil may be at risk of FGM include:
    - The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

    - FGM being known to be practised in the girl's community or country of origin
    - A parent or family member expressing concern that FGM may be carried out
    - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
    - A girl:
        - Having a mother, older sibling or cousin who has undergone FGM
        - Having limited level of integration within UK society
        - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
        - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
        - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
        - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
        - Being unexpectedly absent from school
        - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication
- The above indicators and risk factors are not intended to be exhaustive.

D.10. Marriage

Marriages both unofficial (non-binding) as well as 'official' marriages before a child's 18th birthday are ~~now~~ a crime. On becoming aware of a marriage before a child's 18th birthday, even if there have been no threats, violence or coercion used, The DSL will:

- Speak to the child about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Contact the police.
- Refer the child to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

D.11. Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or

- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training, write a Prevent Risk Assessment for the school and make sure that staff have access to appropriate training to equip them to identify children at risk.
The risk of children in our schools being drawn into terrorism will be assessed. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
Schools ensure that suitable internet filtering is in place, and equip pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in a child's behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a child is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination.
It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
If staff are concerned about a child, they will follow the procedures set out in this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

D.12. Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect, nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

The DSL will record all incidents of sexual violence and harrassment child on child on the online Child Protection system as well as within a separate document.

D.13 Serious violence

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

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

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

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Weapon carrying and the Intent Threshold

In alignment with 'Working Together to Safeguard Children' the intervention threshold regarding weapons and serious violence within GLT schools is defined as the 'Intent Threshold'.

All staff are under a strict statutory duty to report to the DSL if a student explicitly communicates, gestures, or writes about an **Intention** or **Desire** to carry or use a weapon. The school will initiate protective multi-agency screening and preventative interventions immediately upon the expression of intent, rather than waiting for a physical weapon infraction to materialise on school grounds.

D.14. Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the school, their credentials and reason for visiting will be checked before allowing them to enter the school. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear the correct coloured Lanyard to show if they are DBS checked. Those visitors without DBS check must be accompanied at all times by a member of school staff.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists or social workers, will be asked to show photo ID and will be asked to show their DBS certificate, which will be checked alongside their photo ID; or the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. The school will not invite into the school any speaker who is known to disseminate extremist views, and will carry out

appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Racism and Faith targeted abuse including treating a child differently, harming them or singling them out due to their race, skin colour, ethnic group, nationality or religious beliefs.
This can manifest itself within verbal and Emotional Abuse, Physical Harm, Online/cyber bullying, Hate incidents and crime. Racism and Faith targeted abuse can significantly affect a child's welfare, well-being and sense of security.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Online misinformation, disinformation, fake news generated by AI/ social media.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- Children are more likely to know their abuser than not.
- Under 13s can never legally consent to sexual activity.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs
- Where a child is alleged to have perpetrated abuse, the school may signpost support such as 'Shore Space' (Lucy Faithfull Foundation) for confidential advice.
- Local Authority Co-ordinated Family Help - children who may require Family Help
- Children who are frequently or persistently removed from the classroom for behavioural reasons (requiring and assessment of underlying trauma, unmet SEND or domestic vulnerabilities)
- Children who are placed onto adapted -time tables or alternative provision frameworks, recognising their heightened exposure to Child Criminal Exploitation (CCE) and county lines operations.
- Children demonstrating severe, intersecting mental health issues (including but not limited to acute eating disorders, clinical anxiety or documented suicidal ideation) which must be managed as a dual safeguarding and pastoral risk matrix rather than treated purely as a medical issue.

Appendix 2: allegations of abuse made against staff/low-level concerns

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
- If there is any doubt as to whether a concern meets the harm threshold, the local authority designated officer (LADO) will be contacted.

An allegation can also relate to an adult's behaviour outside of work, and their relationships with others if they:

- Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to relate directly to a child but could, for example, include an arrest for the possession of a weapon.
- Have, as a parent or carer, become subject to child protection procedures.
- Are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child or children for whom the adult is responsible in their employment/volunteering.

KCSIE states that, as part of a whole school approach to safeguarding, schools should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

Any allegation of abuse will be dealt according to the GLT Disciplinary Policy.

The parents or carers of the child/children involved about the allegation will be informed as soon as possible (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while investigations are ongoing. The parents or carers of the child/children involved will be kept informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).

A referral will be made to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

Ofsted will be informed of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or

elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

Section 2: concerns that do not meet the harm threshold/low level concerns

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

GLT recognises the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns
The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

The term 'low-level concern' does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt'.

Sharing low-level concerns
We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.
We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer if, for example, if they know are going to be in a situation which would be deemed a breach of the staff code of conduct (for example, a staff member has a child

who is a pupil in the school and they have the mobile number of their child's friend) or if they find themselves in a situation which could be misinterpreted, or might appear compromising to others.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Ensuring our ongoing culture of vigilance maintains a mindset that 'it could happen here'.

Responding to low-level concerns

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously, to the individual involved and any witnesses.

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with GLT's Staff Code of Conduct. The Headteacher will seek advice from the school DSL, the GLT HR Team and the Director of Education as appropriate.

Record keeping

The Headteacher will ensure that all low-level concerns will be recorded in writing and held on a secure file or on Staffsafe. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold this will be referred to the designated officer at the local authority.
- Retained in accordance with the GLT Data Retention Procedures.
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

Low-level concerns will not be included in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 3: Encompass – Supporting Children Affected by Domestic Abuse

What is Encompass?

Encompass is a national initiative designed to support schools in identifying and providing timely support for children and young people who are affected by domestic abuse. Encompass works by

ensuring that schools are notified when a child or young person is involved in an incident of domestic abuse, enabling staff to offer early intervention and support where necessary.

The Encompass Process

When a domestic abuse incident is reported to the police, the Encompass process ensures that key staff at the school (usually the Designated Safeguarding Lead or Headteacher) are notified as soon as possible. The notification provides information about the child and the circumstances of the domestic abuse. This information allows the school to assess the situation and provide support, ensuring the child's welfare is prioritized.

- **Notification Timing:** Police forces aim to notify schools as soon as possible after an incident, often within 24 hours, ensuring the school can respond promptly.

- **Confidentiality and Consent:** The details of the domestic abuse incident shared with schools are done so with the knowledge and consent of the police. Information is shared on a need-to-know basis to protect the safety and well-being of the child and family.

- **Safeguarding Action:** After receiving notification, the school's safeguarding team will discuss the incident and assess the child's needs. Actions may include offering emotional support, providing a safe space at school, referring the child for counseling, or working with external agencies.

Role of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) plays a critical role in responding to Encompass notifications. Upon receiving information, the DSL is responsible for:

- Noting the nature of the domestic abuse incident and identifying any immediate safeguarding concerns for the child.

- Consulting with relevant staff members to determine appropriate next steps for support, including liaising with the child's family, the police, and other agencies as necessary.

- Keeping a record of any interventions, actions taken, and ongoing monitoring of the child's well-being.

Support for the Child

Encompass aims to ensure children affected by domestic abuse are supported both academically and emotionally:

- **Emotional and pastoral support:** Schools may offer counseling services or provide a trusted adult the child can confide in.

- **Referral to external agencies:** Where appropriate, referrals to specialist services such as domestic abuse support agencies, social services, or mental health services may be made.

- **Flexible approach:** The school may adapt its approach to meet the individual needs of the child, such as adjusting attendance, allowing additional breaks, or providing more structured emotional support.

Training and Awareness

All school staff, including teachers and support staff, will receive training to understand the impact of domestic abuse on children and how to respond to Encompass notifications. This ensures staff are able to:

- Recognise signs of distress or behavioral changes in children who may be affected by domestic abuse.

- Provide appropriate support and make referrals to external services when necessary.

- Understand the importance of confidentiality and safeguarding in the context of Encompass notifications.

Monitoring and Review The effectiveness of the Encompass initiative will be regularly reviewed as part of school safeguarding audits. Schools will monitor the outcomes of interventions, track the progress of children affected by domestic abuse, and adjust support plans as needed to ensure the child's continued safety and well-being.

Appendix 4. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2026), Working Together to Safeguard Children (2026) and the Governance Handbook.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race)
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- Requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage
- Guidance for Gender questioning Children (December 2023)
- Guidance for Preventing Radicalisation (Draft awaiting final publication July 2024)
- Statutory guidance RSHE (September 2026)
- Guidance and advice for educational settings working with children in response to dealing with an incident of sharing nudes and semi- nudes March 2024 UKCIS
- Social care national framework DFE December 2023
- Information sharing advice for practitioners providing safeguarding services for Children, young people, parents and carers DFE May 2024
- CSA Centre for Expertise on Child Sexual Abuse: https://www.csacentre.org.uk/
- The Children's Society – Child Sexual Exploitation Resources: https://www.childrenssociety.org.uk/what-we-do/our-work/child-sexual-exploitation
- Early Years Foundation stage statutory framework September 2025

2025https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

- The children's wellbeing and School's Act 2026

This policy complies with the Greenshaw Learning Trust's funding agreement and articles of association.

The Trust and its schools will engage with any locally agreed multi-agency procedures put in place by the three school safeguarding partners as identified in Keeping Children Safe in Education.

The Trust and its schools will cooperate with any statutory safeguarding assessments conducted by children's social care. This includes ensuring representation at appropriate inter agency meetings such as children in need, child protection meetings, strategy meetings, local hub MASH meetings and core group meetings.

The Trust will actively engage with local safeguarding partnerships and participate in relevant multi-agency forums and training.

Appendix 5- Greenshaw Learning Trust Guidance for Safe Sleeping, Allergy Management, and Safer Eating in Early Years Settings.

1. Safe Sleeping Guidance

This guidance applies to all children in our care who require sleep or rest periods during the day. All staff must follow these practices to mitigate the risk of Sudden Infant Death Syndrome (SIDS).

Sleep Environment & Setup

- Sleeping Position: Children must always be placed on their backs to sleep, with their feet touching the foot of the cot or sleep mat ("feet-to-foot" position).
- Bedding & Mattress: Mattresses must be firm, flat, and covered with a waterproof, well-fitting sheet. No soft bedding, pillows, duvets, bumper pads, or soft toys are permitted in cots or on sleep mats.
- Temperature Control: The sleep room/area must be maintained at a comfortable temperature—ideally between 16°C and 20°C. Staff must monitor room thermometers regularly.
- Clothing: Swaddling is not permitted unless explicitly agreed upon in writing with parents. Children must not sleep in outdoor clothing, hoods, or hats.

Supervision & Monitoring

- Physical Checks: Sleeping children must be physically checked every 10 minutes. Staff must physically approach the child to observe breathing patterns and skin color—relying on baby monitors alone is not sufficient.
- Logging: Every check must be recorded on the *Sleep Monitoring Log*, noting the time, the child's condition, and the initials of the staff member.

2. Allergy Management & Law

We operate a strict allergen management framework to protect children with known allergies and food intolerances, ensuring full compliance with UK food information regulations (including Natasha's Law). Refer to the Greenshaw Learning Trust Food Nutrition, Food Standards and Allergen policy and the Greenshaw Learning Trust Allergy Policy (from October 2026).

Identification & Documentation

- Care Plans: Any child with an allergy must have an *Individual Health Care Plan (IHCP)* signed by parents and medical professionals, detailing triggers, symptoms, and emergency medication (e.g., adrenaline auto-injectors/AAIs).
- Visual Alerts: Up-to-date dietary matrix sheets featuring children's photos, specific allergies, and symptoms must be clearly displayed in the kitchen, food preparation areas, and the classroom.

Food Preparation & Service

- Cross-Contamination: Separate, color-coded utensils, chopping boards, and preparation areas must be used for allergen-free meals.
- The "Two-Person Check": Before any food or drink is served to a child with an allergy, a minimum of two staff members must independently verify that the meal matches the child's dietary care plan.

3. Safer Eating & Choking Prevention

Food must be prepared and served in a way that matches the developmental stage of the child to reduce the risk of choking.

Food Preparation Standards

Food Item	Prep Requirement	Reason
Grapes & Cherry Tomatoes	Must be cut lengthwise into quarters.	Their round shape can perfectly block a young child's airway.
Sausages / Hot Dogs	Must be cut lengthwise, then chopped into small, crescent-shaped pieces.	Prevents round, coin-shaped plugs.
Apples & Pears	Must be peeled, cored, and thinly sliced or grated.	Hard textures are difficult to break down without molars.
Meat & Fish	All bones, skin, and gristle must be completely removed.	Eliminates unexpected choking hazards.

*Banned High-Risk Foods: Whole nuts, popcorn, whole marshmallows, and hard boiled sweets are strictly banned from all of our schools.

Supervised Mealtimes in Early Years Settings

- Staff Positioning: Staff must sit directly with the children during mealtimes, ensuring they maintain active, face-to-face visual supervision. Staff must not carry out administrative or cleaning tasks while children are eating.
- Eating Posture: Children must sit upright at a table while eating or drinking. Walking, running, or playing with food in their mouths is prohibited.

- Staff Training: Early Years staff must hold a valid Paediatric First Aid certificate, ensuring they are trained to immediately recognize and respond to signs of choking.