Safeguarding and Child Protection

1   Introduction

1.1   The Heart of Mercia Multi Academy Trust has a statutory and moral duty to ensure that each institution functions with a view to safeguarding, protecting, and promoting the welfare of every child and young person who accesses education or training. The Trust believes every learner has the right to feel safe and protected.

The Trust is clear that safeguarding and promoting the welfare of children is the responsibility of all those who are employed by, volunteer for, or offer services to HoM. This means that any Trust employee who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all staff working in the Trust are directed to ensure their approach is child-centred and consider, at all times, what is in the best interests of the child.

To achieve and sustain this approach, the Trust recognises that HoM and its academies are an important part of the wider safeguarding system for children, and work with all external partners, both locally and nationally, to promote and ensure children's safety and protection.

The Trust also recognise that it is important to share good practice and require each of its academies to keep children and staff safe through compliance with safeguarding legislation. This includes having rigorous recruitment processes for staff and volunteers, induction, and mandatory and ongoing training.

Each academy is aware that vulnerable adults may be enrolled who also require support to keep them safe from harm (including significant harm).

2   Aim

2.1   The purpose of this document is to provide an umbrella summary of the aspects of safeguarding and child protection that are common across HoM and its academies. Each academy within the Trust has a context-specific Safeguarding and Child Protection Policy which is published on its individual website.

This policy is also intended to provide an overview of key personnel in each academy (see Appendix 4), legislation and statutory guidance, roles and responsibilities of safeguarding staff and all staff, confidentiality, recognising and responding to different types of abuse, referral processes, complaints, record keeping, training, safer recruitment, managing allegations and specific safeguarding issues.

3   Other relevant policies and documents

3.1   HoM has several Trust Wide polices that are relevant here. These are:

- HoM Staff Code of Conduct

- • HoM Complaints policy

- • HoM Data Protection Policy

- • HoM Disciplinary policy

- • HoM Whistleblowing Policy

- • HoM Managing Allegations policy

Furthermore, each academy will have their own policies and procedures that are specific to their context and will include:

- • Safeguarding and Child Protection
- • Complaints and Concerns
- • Student Behaviour
- • Health and Safety Policy and Procedures
- • Disciplinary Procedures for students
- • Equality, Diversity and Inclusion Policy and Procedures
- • First Aid Policy and Procedures
- • Substance Misuse Policy and Procedures
- • Trips and Visits Policy and Procedures
- • Work Experience Policy and Procedures
- • IT Acceptable Usage Policy and Procedures
- • Recruitment Policy and Procedures
- • Managing Allegations

This list is not intended to be illustrative rather than exhaustive.

Their policies and procedures will also be informed by the following:

Department for Education/Government Guidance

[Keeping children safe in education 2025](#)

[Working together to safeguard children 2023: statutory guidance (publishing.service.gov.uk)](#)

[Mental health and behaviour in schools (2018)](#)

[What to do if you're worried a child is being abused: advice for practitioners (2015)](#)

[Multi-agency statutory guidance on female genital mutilation (updated 2020)](#)

[Teachers' Standards: Guidance for school leaders, school staff and governing bodies (updated 2021)](#)

[SEND Code of Practice (2014; updated 2020)](#)

[Prevent duty guidance: for England and Wales (updated 2024)](#)

OFSTED

[Education inspection framework (updated 2023)](#)

[Inspecting safeguarding in early years, education and skills settings (updated 2023)](#)

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (2024)](#)

Legal Documents

[The Children Act 2004](#)

[The Children and Families Act 2014](#)

[The Children and Social Work Act 2017](#)

[Serious Crime Act 2015 (relating specifically to the reporting of cases of FGM)](#)

[The Care Act 2014](#)

Local Safeguarding Children's Board documentation:

- [Herefordshire Safeguarding Children Partnership](#) (Hereford Sixth Form College and John Kyrle High School)
- [Worcestershire Safeguarding Children Partnership](#) (Worcester Sixth Form College and The Chantry School)
- [Dudley Safeguarding People Partnership](#) (King Edward VI College)

3.2   The Trust aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- All staff are aware of their statutory responsibilities with respect to safeguarding;
- Staff are properly trained in recognising and reporting safeguarding issues.

3.3   Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance **Keeping Children Safe in Education (2025)** and **Working Together to Safeguard Children (2023),** and the Governance Handbook.

The Trust complies with this guidance and the arrangements agreed and published by each academy's three local safeguarding partners. This policy is also based on the following legislation:

- Part 3 of the schedule to the **Education (Independent School Standards) Regulations 2014**, which places a duty on academies and independent schools to safeguard and promote the welfare of students
- 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). This means HoM Trustees and leadership teams should carefully consider how they are supporting their students with regard to these characteristics. The Act allows HoM academies to take positive action to deal with particular disadvantages affecting students (where they can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The **Public Sector Equality Duty** (PSED), which explains that the Trust must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps the Trust to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- **The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018** (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

This policy also complies with the Trust and its academies funding agreement(s) and Governance procedures.

4   Safeguarding and promoting the welfare of children means:

4.1
- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

4.2   Definitions and terminology

- **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- **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 a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into activity that they may not fully understand, consent to, or be able to refuse.
- **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.
- **Adult at risk** (defined by the **Care Act 2014**) is an adult who:
  - has needs of care and support (whether or not the local authority is meeting any of those needs); and
  - is experiencing, or at risk of, abuse and neglect; and
  - as a result of those care and support needs is unable to protect themselves from either the risk of, the experience of abuse and neglect

If there is a concern that an adult may be at risk of harm or significant harm, a request for advice and/or an appropriate referral will be made to the adult safeguarding board in the local authority where the student resides.

- **Contextual Safeguarding** is an approach to understanding and responding to children's experiences of significant harm beyond their family and home. Safeguarding incidents and/or behaviours can be associated with factors outside of the Trust and can occur between children outside of the academies. Staff should be considering the context within such incidents and/or behaviours through assessing the wider environmental factors that are present in a student's life that are a threat to their safety and welfare.

Geographical Factors	Trust Response
The academies are based in very diverse locations which present different challenges. These include rural locations where inexperienced, young drivers can be at risk (and a potential risk to others) and a town centre campus surrounded by a busy ring road with problematic transport hubs. Some students can access illegal substances and vapes in local shops, neighbouring towns, and accessible city centres, as well as being exposed to and involved in anti-social behaviour.	The Trust's wider curriculum educates students about the issues of safety on the roads, on public transport, the dangers of drug use and vaping and how to report concerns. The Trust works with external partners to deliver assemblies and organise events and activities to help students develop the skills to keep themselves and others safe and make healthy choices.
Social and Economic Factors	**Trust Response**
All academies draw from both affluent and deprived areas which can affect access to resources, extracurricular opportunities, and parental support. Some students live in rural, isolated communities and some reside in busy, urban areas.	The Trust works to bridge these gaps by providing equitable resources, fostering an inclusive environment, and implementing targeted support programs, including financial assistance where appropriate, to ensure all students succeed regardless of their background.
Peer Group Factors	**Trust response**
All academies recognise peer pressure can influence students' behaviour, leading to issues such as bullying, truancy, and substance use which can disrupt the learning environment and negatively impact the wellbeing of students.	The Trust fosters a positive and inclusive culture whilst addressing negative influences through strong safeguarding and pastoral care and promoting strong, supportive relationships amongst staff and students. Our wider curriculum helps students develop confidence and self-

	esteem and teaches them how communicate effectively.
Home/Family Factors	**Trust Response**
All academies acknowledge that the educational backgrounds, cultural values and socioeconomic status of parents and guardians can shape their expectations and involvement in their child's education. However, we also recognise that safeguarding issues and problems can affect any family, regardless of their employment status, financial situation, or available opportunities. These challenges are not confined to any particular socioeconomic group and can arise in any household.	The Trust creates a nurturing and responsive environment in each academy and provides support to help students navigate personal challenges. Staff establish strong connections with parents and guardians to ensure a collaborative approach and signposts to external agencies, including Early Help, where appropriate.
Online Factors	**Trust Response**
All academies appreciate that many of our students have internet access at home and frequently use gaming devices to play online games with friends. They also visit various websites and engage on social media platforms. Whilst this connectivity offers numerous educational and social benefits, it also presents several challenges and can lead to safeguarding issues. Increasingly, students are also interacting with Artificial Intelligence (AI) tools and platforms, which can generate content, simulate conversations, and influence online behaviour. While AI can enhance learning and creativity, it also introduces risks such as exposure to inappropriate or misleading content, data privacy concerns, and the potential for manipulation or exploitation. Staff must remain vigilant and ensure students are educated about safe and responsible use of AI alongside other digital technologies.	Through our wider curriculum, students are taught about online safety. Every student has signed our 'Acceptable Use' contracts. Our filtering and monitoring systems allow for a proactive and responsive approach to target groups of students or individuals, and the flexibility to respond to academy incidents. As part of our digital safeguarding strategy, students are also educated about the safe and ethical use of Artificial Intelligence (AI), including understanding how AI-generated content can influence behaviour, spread misinformation, or pose privacy risks. Parents are informed and updated on online safety regularly and invited to talks provided by external partners, which now include sessions on emerging technologies such as AI to ensure a shared understanding of the opportunities and risks they present.

The following **three safeguarding partners** are identified in **Keeping Children Safe in Education** (and defined in the **Children Act 2004**, as amended by Chapter 2 of the **Children and Social Work Act 2017**).

- The local authority (LA);
- A clinical commissioning group for an area within the LA;
- The chief officer of police for a police area in the LA area.

They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- **Victim** is a widely understood and recognized term, but the Trust understands 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, the Trust 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, the Trust will consider what terminology it uses carefully (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. The Trust will decide what language is appropriate and which terms to use on a case-by-case basis.

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4.3   Equality Statement

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

The Trust gives special consideration to children who:

- Have special educational needs (SEND) or disabilities;
- Are young carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse;
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- Are asylum seekers or refugees;
- Are at risk due to either their own or a family member's mental health needs;
- Are looked after or previously looked after.

5   Roles and responsibilites

5.1   Safeguarding and child protection is the responsibility of everyone. This policy applies to all staff, volunteers and Trustees across the Trust and is consistent with the procedures of the three safeguarding partners. HoM policy and procedures also apply to extended academy and off-site activities.

The Trust and its academies play a crucial role in preventative education. This is in the context of a whole-setting approach to preparing students for life in modern Britain and beyond, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policies
- Pastoral support systems
- Planned tutorial curriculum which is inclusive and delivered regularly, tackling issues such as:
    o Healthy and respectful relationships
    o Boundaries and consent
    o Stereotyping, prejudice and equality
    o Body confidence and self-esteem
    o How to recognise an abusive relationship (including coercive and controlling behaviour)
    o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

        o   What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.2 All staff

All student-facing staff will:

- Read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2025, and review this guidance at least annually;
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance, read, understood, and agree to abide by the principles outlined in it;
- Reinforce the importance of online safety;
- Provide a safe space for students who are LGBTQI+ to speak out and share their concerns.

All staff who do not work directly with students can be provided with Annex A: Safeguarding information for school and college staff (instead of Part one) if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare of and safeguard children.

All staff at each academy will be aware of:

- HoM systems which support safeguarding, including the Child Protection and Safeguarding policy, the HoM Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and Deputy Designated Safeguarding Leads (DDSL), the behaviour policy and Acceptable Use policy;
- The early help assessment process 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;
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child (sometimes known as peer-on-peer) 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);
- 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, in education and online;
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children;

- What to look for to identify children who need help or protection

5.3 The Designated Safeguarding Leads (DSL)

The DSLs at each HoM academy are members of the Senior Leadership Teams. The DSL takes lead responsibility for child protection and wider safeguarding in the academy. During term time, the DSL will be available during opening hours for staff to discuss any safeguarding concerns and each academy is responsible for arranging adequate and appropriate cover for any out of hours/out of term activities. Details of safeguarding personnel at each HoM academy are listed in Appendix 4.

When the DSL is absent, the Deputy DSLs will act as cover.

As outlined in Annex C of Keeping Children Safe in Education 2025, each DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters;
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- Contribute to the assessment of children;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Prevent, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- Have a good understanding of harmful sexual behaviour.

The DSL will also:

- Keep the Principal/Head informed of any issues;
- 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 academy's policies;
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support;
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and the DDSL are set out in their job descriptions.

5.4 The Trust Board

The Trust Board will:

- Facilitate a whole Trust and whole-institution approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development;

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold each Principal/Head to account for its implementation;
- Be aware of its obligations under the **Human Rights Act 1998**, the **Equality Act 2010** (including the **Public Sector Equality Duty**) and the academy's local multi-agency safeguarding arrangements;
- Appoint a Trustee Safeguarding Lead (currently Katie Jackson) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;

- Online safety is a running and interrelated theme within the whole-academy approach to safeguarding and related policies, including the responsible and ethical use of emerging technologies such as Artificial Intelligence (AI), which are now part of students' digital experiences both in and out of school or college.
- The leadership teams 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—including those related to AI-generated content, misuse of AI tools, or emerging risks associated with AI platforms.

- Each academy 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;
- 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.

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the institution 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 institution about safeguarding arrangements, where appropriate;
- Make sure that safeguarding requirements are a condition of using the academy's premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

Where students at the schools are accessing their education through alternative provision (AP) the Trust Board will:
Ensure:

- all alternative provision (AP) settings commissioned for students meet the same safeguarding standards as our academies

- written confirmation is obtained from AP providers that all staff have undergone full safer recruitment checks, with updates provided on any staffing changes that may affect student safety
- the academies maintain accurate records of all AP locations, including satellite sites, and ensuring students' whereabouts are known during school hours
- AP placements must be reviewed at least half-termly to confirm the setting remains appropriate, safe, and that the student is attending regularly

If safeguarding concerns arise, the Trust must immediately review the placement and terminate it if necessary to protect the student.

The Chief Executive or Chair of the LGB at the respective academy will act as the 'case manager' in the event that an allegation of abuse is made against the Principal/Head, where appropriate (see Appendix 2).

All Trustees will read **Keeping Children Safe in Education 2025** in its entirety.

5.5 The Principal/Head of an academy

The Principal/Head of each individual HoM academy is responsible for the implementation of this policy and ensuring that staff (including temporary staff) and volunteers:

- are informed of 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, neglect and exploitation;
- Communicating this policy to parents/guardians when their child joins the institution and via the institution's website.

The Principal/Head of each individual HoM academy is responsible for:

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update the content of the training regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 2);
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this;
- Ensuring the relevant staffing ratios are met, where applicable.

6 Confidentiality

6.1 The Trust's approach to confidentiality and data protection is detailed in the Confidentiality and Data Protection Policies. With respect to safeguarding, the process. and principles for

sharing information within each academy and within the Trust itself, and with the three safeguarding partners and other agencies are:

- 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;
- The **Data Protection Act (DPA) 2018** and 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 2018** 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;
- If a victim asks the academy not to tell anyone about the sexual violence or sexual harassment:
  o There's no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies;
  o The DSL will have to balance the victim's wishes against their duty to protect the victim and other children;
  o The DSL should consider that:
    ▪ Parents or carers should normally be informed (unless this would put the victim at greater risk);
    ▪ 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;
    ▪ 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.
- Regarding anonymity, all staff will:
  o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system;
  o 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.
- The Government's information sharing advice for safeguarding practitioners includes seven 'golden rules' for sharing information and will support staff who have to make decisions about sharing information;
- If staff are in any doubt about sharing information, they should speak to the DSL or DDSL;
- Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff in Appendix 2.

7 Recognising abuse and taking action

7.1 HoM employees, volunteers, and Trustees (henceforth referred to collectively as staff) must follow the procedures set out below in the event of a safeguarding issue.

If a child is suffering or likely to suffer harm, or in immediate danger:

- Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or is likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**
- Tell the DSL as soon as possible if they make a referral directly and then record on the institution's recording system (CPOMS, My Concern or Safeguarding Portal) immediately;
- The link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to a member of staff

If a child discloses a safeguarding issue, staff should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions;
- Stay calm and do not show any shock or upset;
- Tell the child they have done the right thing in telling a member of staff. Do not tell them they should have told someone sooner;
- Explain what will happen next and that the information will have to be passed on. Do not promise to keep it a secret;
- Write up the conversation as soon as possible in the child's own words. Stick to the facts, and do not add any opinion or judgment;
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that this has been done. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process;
- Bear in mind that some children may:
  - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected;
  - Not recognise their experiences as harmful;
  - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should prevent staff having 'professional curiosity' and speaking to the DSL if they have concerns about a child.

7.3   If staff discover that FGM has taken place or a student is at risk of FGM

The Department for Education's **Keeping Children Safe in Education 2025** explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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

Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix 3.

Any teacher who either:

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

This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it unless they have been specifically told not to disclose.

They should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow the local safeguarding procedures.

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

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the academy's senior leadership team, The Trust Safeguarding Coordinator, the Chief Executive and/or take advice from local authority children's social care.

7.5 Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The Trust will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment as part of local arrangements.

The DSL will keep the case under constant review and the individual academy will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

7.6 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL/DDSL will make the referral.

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.

7.7 If staff have concerns about extremism

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of the Trust's safeguarding approach.

- **Extremism** ([New definition of extremism (2024)](#)) is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:
  1. negate or destroy the fundamental rights and freedoms of others; or
  2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- **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 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.

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include **Prevent** or the local authority children's social care team.

The Department for Education also has a **dedicated telephone helpline, 020 7340 7264**, which staff and governors can call to raise concerns about extremism with respect to a student.

You can also email counter.extremism@education.gov.uk Note that this is not for use in emergency situations.

In an emergency, call 999 or the **confidential anti-terrorist hotline on 0800 789 321** if members of staff:

- 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.

7.8 Concerns about a staff member, supply teacher, contractor, or volunteer

If a member of staff has concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Principal/Head of the academy.

If the concerns/allegations are about the Principal/Head, speak to the Chair of the LGB at the academy or the Chief Executive who will follow the procedures as set out in the HoM Managing Allegations policy.

Where appropriate, the academy will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix 2 for more detail).

7.9 Allegations of abuse made against other students

The Trust recognises 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 students.

The Trust also recognises the gendered nature of child-on-child/peer-on-peer abuse. However, all child-on-child/peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of students hurting other students will be dealt with under the academy's 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 students in the academy at risk;
- Is violent;
- Involves students being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure,
- sexual assault, up-skirting or sexually inappropriate pictures or videos (including sexting).

7.10 Procedures for dealing with allegations of child-on-child/peer-on-peer abuse

If a student makes an allegation of abuse against another student:

- Staff must record the allegation and tell the DSL, but do not investigate it;
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to, if needed;
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

At the start of every year, the DSL will remind colleagues of the procedures for reporting child-on-child/peer-on-peer abuse.

The Trust will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys;
- Ensuring the academy tutorial and wider curriculum helps to educate students about appropriate behaviour and consent;
- Ensuring students know they can talk to staff;
- Ensuring staff are trained to understand that a student 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.

7.11 Sexting

The approach of HoM is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders and Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024)

Staff responsibilities when responding to an incident

If a member of staff is made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), they must report it to the DSL immediately.

Staff must not:

- view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal (see note below);
- delete the imagery or ask the young person to delete it;
- ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent);
- share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers;
- say or do anything to blame or shame any young people involved.

Note: In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).

If a member of staff has already viewed the imagery by accident (e.g. if a young person has showed it to them before they could ask them not to), they must report this to the DSL (or equivalent) and seek support.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to student(s);
- If a referral needs to be made to the police and/or children's social care;
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed);
- What further information is required to decide on the best response;
- Whether the imagery 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 from devices or online services;
- Any relevant facts about the students involved which would influence risk assessment;
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the students involved (in most cases parents 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 young person 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 imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts;
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)
- If none of the above applies then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

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

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a student 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

The DSL will inform parents 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 student at risk of harm.

Referring to the police
If it is necessary to refer an incident to the police, this will be done through dialling 101.

Recording incidents
All sexting incidents and the decisions made in responding to them will be recorded. The record keeping arrangements of this policy also apply to recording incidents of sexting.

Curriculum coverage
Students are taught in an age appropriate manner about the issues surrounding sexting as part of the academy's tutorial curriculum.

Teaching covers the following in relation to sexting:
- What it is;
- How it is most likely to be encountered;
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive;
- Issues of legality;

- The risk of damage to people's feelings and reputation.

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images;
- The receipt of such images.

Students can report concerns to:

- Any member of the pastoral team, including the DSL;
- Any member of staff

Students are made aware of the reporting systems and processes through discussion in tutorial, assemblies, newsletters, posters and each institution's website.

Any disclosure/ report will be managed in such a way the students will feel safe in submitting any concerns, including an understanding of what might happen next.

7.12   Online safety and the use of mobile technology

The Trust recognises the importance of safeguarding children from potentially harmful and inappropriate online material and understands that technology is a significant component in many safeguarding and wellbeing issues.

To address this, the Trust and it academies aim to:

- Have robust processes in place to ensure the online safety of students, staff volunteers and Trustees;
- Protect and educate the whole community in its safe and responsible use of technology, including mobile and smart technology (referred to as mobile phones);
- Set clear guidelines for the use of mobile phones for the whole community;
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

To meet these aims and address the risks the Trust and its academies will:

Educate students about online safety as part of the curriculum. For example:
- The safe use of social media, the internet and technology;
- Keeping personal information private;
- How to recognise unacceptable behaviour online;
- How to report incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.

The Trust and its academies will also:

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalization. All staff members will receive refresher training at least once each academic year;

- Educate parents and guardians about online safety via the Trust and/or academy's website, communications sent directly to them and via information events. The Trust will also share clear procedures with them, so they know how to raise concerns about online safety;
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

  o Staff are allowed to bring their personal phones to work for their own use but will limit such use to non-contact time when students are not present;
  o Staff will not take pictures of recordings of students on their personal phones or cameras.

The Trust and its academies will also:

- Make all students, parents, guardians, staff, volunteers, and Trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in the academies, use of the ICT systems and use of their mobile and smart technology;
- Explain the sanctions the Trust will use if a student is in breach of Trust policies on the acceptable use of the internet and mobile phones;
- Make sure all staff, students, parents and guardians are aware that staff have the power to search students' phones as set out in the DfE's guidance on Searching, screening and confiscation in schools
- Put in place robust filtering and monitoring systems to limit children's exposure to the four key categories of risk from the institution's IT systems;
- Conduct an annual review of the Trust's approach to online safety and mobile phone use.

For comprehensive details about academies' policies on online safety and the use of mobile phones, please refer to the relevant academy's online safety policy and mobile phone policy which can be found on their website.

7.13 Notifying parents and guardians

Where appropriate, the Trust will discuss any concerns about a child with the child's parents/guardians. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents/guardians about any such concerns following consultation with the DSL.

If the Trust believes that notifying the parents/guardians would increase the risk to the child, it will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, the Trust will normally notify the parents/guardians of all the children involved.

7.14 Students with special educational needs and disabilities

The Trust recognises that students with special educational needs and disabilities (SEND) 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 disability without further exploration;
- Students being more prone to peer group isolation than other students;
- The potential for students with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

HoM academies offer extra pastoral support for these students to help them overcome the barriers they face.

Any abuse involving students with SEND will require close liaison with the DSL, DDSL(s) and the SENCo.

8   Complaints and compliance

8.1   Any complaints about this policy from outside the Trust should be made in accordance with the Trust's Complaints Policy. Any other complaints should be brought to the attention of the Chair of the Trust in the first instance.

Complaints that are in the public interest and relate to suspected malpractice may be appropriate to raise under the Trust's Whistleblowing Policy.

The Trust will review this policy annually and ensure that practice across the Trust and all academies is in line with this policy. Any review will take into account the most up-to- date legislation and statutory guidance.

The Trust has identified a range of Assurance Methodologies as tools by which compliance with polices can be tested. Those most relevant to this policy include:

- Internal audit through Systems Leadership process;
- External audit;
- Local Advisory Board Member visits;
- Random testing by line managers.

Any other safeguarding-related complaints, for example those related to students or premises, will be addressed in line with this policy.

The Trust's Whistleblowing Policy outlines the procedures for raising concerns about the way any of the academies safeguard their students.

9   Record keeping

9.1   The Trust will hold records in line with its records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing.

If a member of staff is in any doubt about whether to record something, they should discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. These will be held on each institution's safeguarding system (CPOMS, My Concern or Safeguarding Portal) which can be accessed by all staff for reporting incidents but only specified members of staff can see concerns and act on these.

Where students have historically held a paper file with any previous setting, these files will be held in a locked safeguarding cabinet. On receipt of these files, DSL's or DDSL's will read the file and update the student's record on their system to reflect the most up to date concerns.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the academy. If a child moves to another institution, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. To allow the new setting to have support in place when the child arrives, this should be within the first five days of the start of a new term.

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

The Trust's safeguarding record-keeping arrangements are as follows:

- Electronic with some historic records being paper-based;
- Records are kept secure in line with each institution's Data Protection Audit and Risk Assessment.

Information with other agencies is shared in line with local safeguarding procedures. In addition:

- Appendix 2 sets out the Trust's policy on record-keeping specifically with respect to recruitment and pre-employment checks;
- Appendix 2 also sets out the Trust's policy on record-keeping with respect to allegations of abuse made against staff.

10 Training

10.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the institution's safeguarding systems and their responsibilities, and can identify signs of possible abuse or

neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, **Prevent**, 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 (for example, through emails, e-bulletins and staff meetings) 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, if applicable.

10.2 The Designated Safeguarding Lead

The DSL and DDSL(s) will undertake child protection and safeguarding training at least every two years.

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).

They will also undertake Prevent awareness training.

10.3 HoM Trustees and Local Governing Body Members

All Trustees and LGB members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the CEO of the Heart of Mercia Trust or the Chair of Governors at an individual academy may be required to act as the 'case manager' in the event that an allegation of abuse is made against a Principal/Head, they receive training in managing allegations for this purpose.

10.4 Recruitment – interview panels

At least one person conducting any interview for a post at a HoM academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, **Keeping Children Safe in Education 2025**, and will be in line with local safeguarding procedures.

10.5 Staff who have contact with students and families

All staff who have contact with children and families will have access to supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Specific safeguarding supervision is available across the Trust from Sarah MacKenzie (Safeguarding Coordinator) who has received training from the NSPCC. sarah.mackenzie@kedst.ac.uk

11   Equality Impact

The Trust's responsibilities towards promoting equality, diversity and inclusion have been considered when drafting this policy.

Date of review	Date agreed	LGBs	MAT Board	Review date	Comments
2/09/25	21/9/26		05/10/26	September 2026	

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.

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 cyberbullying), causing children frequently to feel rightened or in danger, or the exploitation or corruption of children.

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 nonpenetrative 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.

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.

Exploitation is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into activity that they may not fully understand, consent to, or be able to refuse.

- Sexual Exploitation is when a child is manipulated or coerced into sexual activity in exchange for something they need or want, often involving threats or violence
- Criminal Exploitation involves grooming children into criminal activities such as drug trafficking, theft, or violence, often under coercion or manipulation
- County Lines Exploitation is a specific form of criminal exploitation where children are used to transport drugs and money across regions, often involving travel and isolation from support networks
- Online Exploitation occurs when children are targeted via digital platforms for sexual, financial, or criminal purposes, including through social media, gaming, or AI-generated content
- Financial Exploitation is when a child is manipulated into giving away money or financial information, often through scams or coercive relationships
- Modern Slavery and Forced Labour occurs when children are exploited for labour under threat or deception, often in hidden or informal sectors
- Emotional Exploitation involves manipulating a child's emotions to gain control or compliance, often as part of grooming or coercive control.

Domestic abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional abuse.

All children can experience and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Appendix 2: Safer Recruitment and DBS Checks - Policy and Procedures

The Trust will record all information on the checks carried out in each academy's single central record (SCR).

Copies of these checks, where appropriate, will be held in individual's personnel files. The Trust and its academies follow requirements and best practice in retaining copies of these checks, as set out below.

1. New staff

When appointing new staff, the Trust will:

- Verify their identity;
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). The Trust will not keep a copy of this for longer than six months;
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available;
- Verify their mental and physical fitness to carry out their work responsibilities;
- Verify their right to work in the UK. The Trust will keep a copy of this verification for the duration of the member of staff's employment and for two years afterwards;
- Verify their professional qualifications, as appropriate;
- Ensure they are not subject to a prohibition order if they are employed to be a teacher;
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent;
- Check that candidates taking up a management position are not subject to a prohibition from management (Section 128) direction made by the Secretary of State.

The Trust will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the **2018 Childcare Disqualification Regulations and Childcare Act 2006**. Where the Trust takes a decision that an individual falls outside of the scope of these regulations and does not carry out such checks, the Trust will retain a record of its assessment on the individual's personnel file. This will include an evaluation of any risks and control measures put in place, and any advice sought.

The Trust will ask for written information about previous employment history and check that information is not contradictory or incomplete.

The Trust will seek references on all short-listed candidates, including internal candidates, before interview. The Trust will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Each academy will consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at

interview. Each academy should inform shortlisted candidates that online searches may be done as part of due diligence checks.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

2. Existing staff

If the Trust has concerns about an existing member of staff's suitability to work with children, it will carry out all the relevant checks as if the individual was a new member of staff. The Trust will also do this if an individual moves from a post that is not regulated activity to one that is.

The Trust will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The Trust believes the individual has engaged in relevant conduct https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children ; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the **Safeguarding Vulnerable Groups Act 2006** (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 https://www.legislation.gov.uk/uksi/2009/37/made; or
- The 'harm test' is satisfied in respect of the individual (i.e., they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

3. Agency and third-party staff

The Trust will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that it would otherwise perform. The Trust will also check that the person presenting themselves for work is the same person on whom the checks have been made.

4. Contractors

The Trust will ensure that any contractor, or any employee of the contractor, who is to work at an institution has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity;

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children;
- The Trust will obtain the DBS check for self-employed contractors;
- The Trust will not keep copies of such checks for longer than six months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

The Trust will check the identity of all contractors and their staff on arrival at the academy.

For self-employed contractors such as music teachers or sports coaches, the Trust will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the **2018 Childcare Disqualification Regulations and Childcare Act 2006.**

Where the Trust decides that an individual falls outside of the scope of these regulations and does not carry out such checks, the Trust will retain a record of its assessment. This will include its evaluation of any risks and control measures put in place, and any advice sought.

5. Trainee/student teachers

Where applicants for initial teacher training are salaried by us, the Trust will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, the Trust will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the **2018 Childcare Disqualification Regulations** and **Childcare Act 2006.**

6. Volunteers

The Trust will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. The Trust will retain a record of this risk assessment;
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the **2018 Childcare Disqualification Regulations** and **Childcare Act 2006.**

Where the Trust decides that an individual falls outside of the scope of these regulations and does not carry out such checks, the Trust will retain a record of its assessment. This will include its evaluation of any risks and control measures put in place, and any advice sought.

7. Trustees

All Trustees will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

The Chair of the Trust Board will have their DBS check countersigned by the Secretary of State.

All proprietors, Trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the **Education and Skills Act 2008**;
- Identity;
- Right to work in the UK;
- Other checks deemed necessary if they have lived or worked outside the UK.

8. Adults who supervise students on work experience

When organising work experience, the Trust and its academies will ensure that policies and procedures are in place to protect children from harm.

The Trust will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience.

This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff in a HoM academy, including supply teachers or volunteer has:

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

It applies regardless of whether the alleged abuse took place in an individual institution (transferrable risk).

Allegations against a teacher who is no longer teaching and historical allegations of abuse and non-recent abuse will be referred to the police.

Where the allegation concerns the Chief Executive, the Clerk to the Trust or a senior post holder of the Trust, the HoM Managing Allegations policy should be followed. The following posts are identified as senior post holders of the Trust:

- Heads/Principals of all HoM academies.

- Vice/Deputy Principals of all HoM academies

- HoM Chief Financial Officer

- HoM Human Resources Director

- HoM Chief Information Officer

- Director of Improvement

- Other officers of the Trust as determined by the Chief Executive.

The Trust will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. It should be noted that this will still be the case for any historic allegations which are made.

Academy procedures for dealing with allegations will be applied in accordance with the approach set out in detail in the HoM Managing Allegations policy.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, the Trust will only suspend an individual if it has considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, the Trust will consider alternatives such as:

- Redeployment within the individual institution so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying the individual to alternative work in the institution so that they do not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted;
- Temporarily redeploying the individual to another role in a different location, for example to an alternative institution within the Trust.

Definitions for outcomes of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence);
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Principal /Head of the academy will take the steps detailed below.

Where the Principal/Head, the Chief Executive, the Clerk to the Trust or another senior post holder the Trust is the subject of an allegation, the HoM Managing Allegations policy should be followed.

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police);

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the institution is justified or whether alternative arrangements such as those outlined above can be put in place.

Advice will be sought from the designated officer, police and/or children's social care services, as appropriate;

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the institution and their contact details;

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action and/or liaise with the police and/or children's social care services as appropriate;

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. This will include Trade Union representatives, a colleague, SET HR's service and support through the Trust's EARP;

- Inform the parents or guardians of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or guardians of

the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or guardian who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;

- Keep the parents or guardians of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence);

- Make a referral 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;

- If the academy is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, the Trust will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency (TRA).

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within one week;

If the nature of an allegation does not require formal disciplinary action, the Trust will institute appropriate action within three working days;

If a disciplinary hearing is required and can be held without further investigation, the Trust will hold this within 15 working days.

Specific actions:

- **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

- **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the institution ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the institution's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

- **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the institution.

- **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Principal/Head, or other appropriate person in the case of an allegation against the Principal/Head, will consider whether any disciplinary action is appropriate against the students) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

Confidentiality

The academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared;
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation;
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the academy will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, the Trust will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

The Trust will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, the Trust will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are substantiated, the Trust will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that the Trust can make to its procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff;
- The duration of the suspension;
- Whether or not the suspension was justified;
- The use of suspension when the individual is subsequently reinstated. The Trust will consider how future investigations of a similar nature could be carried out without suspending the individual.

Sharing low-level concerns

HoM Principals/Heads and DSLs will ensure confidentiality when low-level concerns are shared and will model sensitivity in their language and follow up. They may consult the LADO if they are in doubt about the next steps.

Responding to low-level concerns

Email addresses are signposted on the website and so third parties, including parents and guardians, can make direct contact with a senior member of staff if they wish to raise a low-level concern. For concerns being raised by the Heart of Mercia Trust employees, they would be encouraged to speak with a senior member of staff at their HoM academy in the first instance.

Appendix 3: Specific Safeguarding Issues

Child abduction and community safety incidents

- Child abduction is when children are taken from their parents or guardians without permission. It can be committed by parents or other family members, by people known but not related to the child (like neighbours friends and acquaintances), and by strangers;
- Community safety incidents are things like unknown adults loitering nearby or trying to talk to children;
- If you see anything suspicious or that doesn't feel right, report it immediately.

Modern slavery

- This includes human trafficking and slavery, servitude and forced or compulsory labour;
- The exploitation can take many forms, for example sexual exploitation, forced labour, forced criminality and the removal of organs;
- There is a national referral mechanism for modern slavery – contact the DSL should more need to be known about this.

Cybercrime

- This is defined as criminal activity committed using computers and/or the internet;
- This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), and creating and using malware such as viruses;
- Children who are particularly skilled in computing and technology may be drawn into cybercrime – either deliberately or inadvertently.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

There are age-appropriate guides to support 5 to 11 and 12- to 17-year-olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. They can be accessed via Keeping Children Safe in Education 2024 on page 152.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children absent from education

A child not attending their education institution, particularly repeatedly, can be a warning sign of a range 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.

There are many circumstances where a child stops accessing their 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 travelling communities;
- Come from the families of service personnel;
- Go missing or run away from home or care;
- Are supervised by the youth justice system;
- Come from new migrant families.

The Trust and its academies will follow its procedures for unexplained absence, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation. This includes informing an appropriate agency (including Connexions) if a child leaves the institution without a new setting 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 non-attendance, such as travelling to conflict zones, FGM and forced marriage.

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

The Trust also recognises that Working together to improve school attendance (2024) is now a statutory framework and is fully committed to adhering to its principles and expectations. All schools within the Trust will implement the guidance consistently, ensuring a whole-school approach to attendance that prioritises early intervention, strong partnerships with families, and effective collaboration with local authorities and external agencies to support every child's right to education.

Children who need a social worker

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unexplained absence where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can 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.

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. It may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex.

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.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections or becoming pregnant;
- Displaying inappropriate sexualised behaviour;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and/or alcohol;
- Going missing for periods of time, or regularly coming home late;
- Regularly absent from education, or not taking part in education.

Domestic abuse
Children can experience 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.

It can also include ill treatment that isn't physical as well as experiencing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. Children who experience domestic abuse in this form 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.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/ DDSL will be aware of contact details and referral routes in to 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.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' violence (HBV) 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 HBV 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 HBV 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. This policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place;
- A mother/family member disclosing that FGM has been carried out;
- A family/student 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, 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 student may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider);
- FGM being known to be practiced 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 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;
- 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.

Forced marriage

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

The **Marriage and Civil Partnership (Minimum Age) Act 2022**, means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

Staff will receive training around forced marriage and the presenting symptoms. The Trust are aware of the 'one chance' rule, i.e. there may be only one chance to speak to the potential victim and only one chance to save them.

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

- Speak to the student 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;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk;
- Refer the student to an education welfare officer, pastoral tutor, learning mentor, or counsellor, as appropriate.

Preventing radicalisation

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

Educational institutions have a duty to prevent children from being drawn into terrorism.

The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

The Trust will ensure that suitable internet filtering is in place and equip HoM students to stay safe online in education 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 students' behaviour. The government website Educate Against Hate and charity NSPCC say that signs that a student 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 student, they will follow Trust procedures set out in this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Further information on the measures to prevent radicalisation are set out in other policies and procedures, including the Behaviour Policy and Online/ E-Safety Policy.

Checking the identity and suitability of visitors

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

If the visitor is unknown to the setting, the Trust will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to comply with the sign-in system and wear a visitor's badge.

Visitors to any of the Trust academies who are visiting for a professional purpose, such as educational psychologists, 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, the Trust 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 Trust and its staff will not invite any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using Trust facilities is not seeking to disseminate extremist views or radicalise students or staff.

Child criminal exploitation:

County Lines Criminal exploitation of children is a geographically widespread form of harm. A typical feature of County Lines criminal activity is where drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

As with child sexual exploitation, children often do not see themselves as victims or realise they have been groomed to get involved in criminality. So, it is important that the Trust contacts the local police by dialling 101, or in an emergency 999, or use the National Referral Mechanism 102.

Like other forms of abuse and exploitation, County Lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who are regularly absent from education or do not take part in education.

Up-skirting

The **Voyeurism (Offences) Act**, which is commonly known as the **Up-skirting Act**, came into force on 12 April 2019. 'Up-skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

It is a criminal offence.

Anyone of any gender, can be a victim.

Children and online safety away from education setting

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police by the DSL or DDSL within the setting.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **Contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm for example making, sending and receiving explicit images, or online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Online teaching should follow the same principles as set out in the institution's code of conduct.

HoM will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- No 1:1s, groups only (where possible)
- Staff and children must wear suitable clothing, as should anyone else in the household
- Any computers used should be in appropriate areas, for example, not in bedrooms;
- The background should be blurred

- The live class should be recorded (where possible) so that if any issues were to arise, the video can be reviewed
- Language must be professional and appropriate, including any family members in the background
- Staff must only use platforms provided by The Heart of Mercia Trust to communicate with students
- Staff should record, the length, time, date and attendance of any sessions held.

Identity Badges

It is expected that every member of staff visibly wears an identity badge with their title, job role and photograph. This expectation is part of the HoM Staff Code of Conduct.

The badge should be worn with a Trust or relevant academy lanyard. The purpose of this expectation is so that any member of staff is clearly identifiable on site / trips etc. Having an identity badge clearly shows that staff members are legitimate and have been safeguarding trained (as that is an expectation of all members of staff).

Principals/Heads are expected to make sure their staff are wearing their badge at all times when on Trust or academy business. Though, it should be noted that Principals/Heads and staff are expected to use their common sense with this expectation. Sometimes a lanyard and badge should be removed for health and safety purposes or for instances such as photographs or during sports fixtures when refereeing. It is also advisable for staff to remove their badge when leaving site for the day.

Staff are expected to report any loss of their identity badge to their Principal/Head as a matter of urgency. This will not only need to be replaced, but Reception staff alerted that someone else may attempt to use the lost badge to get on site.

Appendix 4: Safeguarding Across the Trust - Important Contacts

Role	Name
Nominated Trustee	Katie Jackson
CEO	Peter Cooper
Safeguarding Coordinator	Sarah MacKenzie

Hereford Sixth Form College

Role	Name	Email
Designated Safeguarding Lead	John Pratt	jpp@hereford.ac.uk
Deputy Designated Safeguarding Leads	Matt Bunston	matt.bunston@hereford.ac.uk
	Phil Tranter	pjt@hereford.ac.uk
	Gemma Cosgrove-Ball	g.cosgrove-ball@hereford.ac.uk
	Jane McDonnell	j.mcdonnell@hereford.ac.uk
	Leila Jackson	leila.jackson@hereford.ac.uk
	Jules Price Hutchinson	jph@hereford.ac.uk
Nominated Governor	Danielle Thompson	
LADO	Terry Pilliner	lado@herefordshire.gcsx.gov.uk
Safeguarding Partners	Herefordshire Council The NHS Herefordshire and Worcestershire Integrated Care Board West Mercia Police	

Worcester Sixth Form College

Role	Name	Email
Designated Safeguarding Lead	Graham Williams	graham.williams@wsfc.ac.uk
Deputy Designated Safeguarding Leads	Heather Anderson-Stevens	heather.anderson-stevens@wsfc.ac.uk
	Michelle Collings	michelle.collings@wsfc.ac.uk
	Sara Payne	sarah.payne@wsfc.ac.uk
	Ellie Clayton	eleanor.clayton@wsfc.ac.uk
	Catherine MacPherson	catherine.macpherson@wsfc.ac.uk
	Catherine Power	catherine.power@wsfc.ac.uk
Nominated Governor	Elle Beale	
LADO		LADO@worcschildrenfirst.org.uk
Safeguarding Partners	Chief Executive of Worcestershire County Council Chief Constable of West Mercia Police Accountable Officer for Herefordshire and Worcestershire Clinical Commissioning Group (CCG)	

King Edward VI College

Role	Name	Email
Designated Safeguarding Lead	Sarah MacKenzie	sarah.mackenzie@kedst.ac.uk
Deputy Designated Safeguarding Leads	Aimie Chatfield	aimie.chatfield@kedst.ac.uk
	Laura Day	laura.day@kedst.ac.uk
	Stuart Parkes	stuart.parkes@kedst.ac.uk
	Lowri Saenger	lowri.saenger@kedst.ac.uk
	Becky Hall (Maternity Cover)	becky.hall@kedst.ac.uk
	Emily Guest	emily.guest@kedst.ac.uk

	Sam Watkins	sam.watkins@kedst.ac.uk
	Rebecca Williamson	rebecca.williamson@kedst.ac.uk
	Mehdi Didarzadeh	mehdi.didarzadeh@kedst.ac.uk
	Alex Branton	alex.branton@kedst.ac.uk
	Ajay Mehta	ajay.mehta@kedst.ac.uk
Nominated Governor	Sian Fletcher	sian.fletcher@kedst.ac.uk
LADO	Yvonne Nelson-Brown	allegations@dudley.gov.uk
Safeguarding Partners	Chief Executive of Dudley County Council Chief Constable of West Midlands Police Accountable Officer for Black Country and West Birmingham Clinical Commissioning Group (CCG)	

John Kyrle High School

Role	Name	Email
Designated Safeguarding Lead	Kristian Phillips	kristianphillips@jkhs.org.uk
Deputy Designated Safeguarding Leads	Georgina Lewis	g.lewis@jkhs.org.uk
	Jordan Salway	j.salway@jkhs.org.uk
	Luke Moseley	lukemoseley@jkhs.org.uk
Nominated Governor	Frances O'Brien	f.obrien@jkhs.org.uk
LADO	Terry Pilliner	allegations@dudley.gov.uk
Safeguarding Partners	Herefordshire Council The NHS Herefordshire and Worcestershire Integrated Care Board West Mercia Police	

The Chantry School

Role	Name	Email
Designated Safeguarding Lead	Jon Hill	jhill@chantryschool.com
Deputy Designated Safeguarding Leads	Samantha Blunt	sblunt@chantryschool.com
	Leah Drust	ldrust@chantryschool.com
	Dave Lewis	dlewis@chantryschool.com
	Nicola Clear	nclear@chantryschool.com
Nominated Governor	Jen Harrison	
LADO		LADO@worcschildrenfirst.org.uk
Safeguarding Partners	Chief Executive of Worcestershire County Council Chief Constable of West Mercia Police Accountable Officer for Herefordshire and Worcestershire Clinical Commissioning Group (CCG)	