

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.

The Trust adopts a child-centred safeguarding approach. Staff should maintain professional curiosity and remember that safeguarding concerns can arise in any family, community, or setting. Staff should work on the basis that "it could happen here" and should not allow assumptions about a child, family, or community to prevent concerns being recognised or acted upon.

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 will maintain procedures that reflect its local safeguarding arrangements, thresholds, referral pathways, and contextual safeguarding risks; their Safeguarding and Child Protection policies are published on their 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

allegations, 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 policies 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 2026](#)

[Working together to safeguard children 2026: statutory guidance](#)

[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 \(2014; updated 2024\)](#)

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

OFSTED

[Education inspection framework \(updated 2025\)](#)

[Inspecting safeguarding in early years, education and skills settings \(updated 2025\)](#)

[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 (2026)** and **Working Together to Safeguard Children (2026)**, 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 **Crime and Policing Act 2026**, which includes changes to the definition of regulated activity with children.
- The **Rehabilitation of Offenders Act 1974**, which outlines when people with criminal convictions can work with children.
- The **Safeguarding Vulnerable Groups Act 2006**, which defines what ‘regulated activity’ is in relation to children (including changes to the definition of regulated activity with children which removes the previous supervision exemption from 1 September 2026)
- 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.
- **Making or sharing nudes or semi-nudes** (sometimes referred to as 'sexting') refers to the creation, possession or sharing of nude or semi-nude images or videos involving children and young people. This may include images created by the child themselves, images created or altered by another person, or material generated or manipulated using artificial intelligence. Staff must report concerns immediately to the DSL and must not view, copy, download, save, forward or share such images or videos.
- **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.

Contextual safeguarding will consider risks arising from relationships, peer groups, education, neighbourhoods, transport networks, online environments, and wider community contexts. This will include risks associated with exploitation, serious violence, organised crime, stalking, financial exploitation, online harms, and emerging technologies.

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,	The Trust fosters a positive and inclusive culture whilst addressing

leading to issues such as bullying, truancy, and substance use which can disrupt the learning environment and negatively impact the wellbeing of students.	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 to 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	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

exploitation. Staff must remain vigilant and ensure students are educated about safe and responsible use of AI alongside other digital technologies.	ensure a shared understanding of the opportunities and risks they present.
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The Trust and its academies will work with the three statutory safeguarding partners and other relevant agencies in accordance with the arrangements published by the relevant local safeguarding partnership.

Academies	Local Arrangements/Safeguarding Partners
Hereford SFC and John Kyrle High School	1) Herefordshire Council 2) NHS Herefordshire and Worcestershire Integrated Care Board (ICB) 3) West Mercia Police
Worcester SFC and The Chantry	1) Worcestershire County Council 2) NHS Herefordshire and Worcestershire Integrated Care Board (ICB) 3) West Mercia Police
King Edward VI College	1) Dudley Metropolitan Borough Council 2) Black Country Integrated Care Board (ICB) 3) West Midlands Police

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.

4.3 Equality Statement

The Trust recognises that some children may face additional barriers to recognising, disclosing, or responding to abuse. Particular consideration will be given to:

- Children with SEND or medical conditions
- Young carers
- Children experiencing mental health difficulties.
- Children who are looked after or previously looked after.
- Children experiencing homelessness or insecure housing.

- Children affected by domestic abuse, exploitation, or serious violence.
- Children who are newly arrived in the UK
- Children who may experience discrimination or targeted abuse because of their race, sex, sexual orientation, gender identity, or other protected characteristic

5 Roles and responsibilities

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:
 - Healthy and respectful relationships;
 - Boundaries and consent;
 - Stereotyping, prejudice, and equality;
 - Body confidence and self-esteem;
 - How to recognise an abusive relationship (including coercive and controlling behaviour);
 - 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;
 - What constitutes sexual harassment and sexual violence and why they are always unacceptable.

Preventative education will also address:

- Racism;
- Derogatory language and behaviour;
- Misogyny and misandry;
- Physical violence and conflict;
- Exploitation;
- Online harms;
- The responsible use of technology and artificial intelligence.

5.2 All staff

Safeguarding is the responsibility of everyone working for or on behalf of the Trust. All staff, including those who do not work directly with children, must:

- read and understand Part One of Keeping Children Safe in Education 2026;
- complete safeguarding and child protection training as part of induction and receive regular safeguarding updates;
- know the identity and role of the DSL and DDSs;
- understand the Trust and academy safeguarding procedures;
- know how and when to report a safeguarding concern;
- understand the local early help, Family Help, and statutory referral arrangements;
- understand the importance of information sharing in safeguarding;
- know how to respond to a child who makes a disclosure;
- recognise signs of abuse, neglect, and exploitation, including online harms;
- understand the procedures for reporting concerns about adults working with children, including low-level concerns;
- understand that safeguarding concerns must be acted upon without delay.

Staff must maintain professional curiosity and should report concerns even where they are not certain that abuse or neglect has occurred.

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 B 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.

The Trust and each academy will ensure that robust and appropriate arrangements are in place to provide safeguarding leadership and advice whenever the DSL is unavailable. These arrangements will include clear lines of accountability, access to safeguarding information and a confidential method for staff to report concerns.

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 safeguarding arrangements for students accessing alternative provision will be reviewed regularly and will include confirmation of the provider's safeguarding arrangements, safer recruitment, attendance, student whereabouts, information sharing and arrangements for reporting and responding to safeguarding concerns.

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 2026** in its entirety.

The Trust Board will seek regular assurance that safeguarding arrangements are effective in practice, including through safeguarding audits, review of training compliance, safer recruitment checks, filtering and monitoring reviews, safeguarding data, child protection file audits, low-level concern monitoring, and student voice.

5.5 The Principal/Head of an academy

The Principal/Head of each individual HoM academy is responsible for the implementation of this policy, including communicating the policy to parents/guardians when their child joins the institution and making it available via the institution's website. They are also responsible for 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;
- undertake appropriate safeguarding and child protection training and regularly update their knowledge.

In addition, the Principal/Head 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;
- 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, although they may wish to collaborate with the DSL on this;
- ensuring the relevant staffing ratios are met, where applicable.

6 Confidentiality

The Trust will comply with the statutory information-sharing duty applying from September 2026 and any associated statutory guidance. Staff must share information where necessary to safeguard or promote the welfare of a child, subject to the relevant legal safeguards and proportionality requirements.

Data protection legislation must not be used as a reason to prevent appropriate safeguarding information being shared. Staff should seek advice from the DSL where they are unsure, but uncertainty must not cause an unnecessary delay where a child may be at risk.

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;
- The academies will share information with relevant agencies in accordance with statutory safeguarding requirements, **Working Together to Safeguard Children** and the **Department for Education's statutory guidance on information sharing**;
- 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:
 - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies;
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children;
 - 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:
 - 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;

- 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 Staff should not wait for permission from the DSL where a child is in immediate danger or where delay could increase the risk of harm.

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.**
- Any safeguarding referral must be made to the local authority in which the child is resident, regardless of where the concern has arisen or where the child attends school.
- The link to the GOV.UK webpage for reporting child abuse to your local council is: <https://www.gov.uk/report-child-abuse-to-local-council>
- 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.

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.

Staff should not investigate the concern or attempt to establish whether an allegation is true. Their role is to listen, respond appropriately, record and report.

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 2026** 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.**

Local Authority Contact Details

Dudley

- Children's Front Door (MASH): 0300 555 0050 (Option 3)
- Emergency Duty Team (out of hours): 0300 555 8574

Herefordshire

- Integrated Front Door (formerly MASH): 01432 260800
- Emergency Duty Team (out of hours): 01905 768020

Worcestershire

- Family Front Door: 01905 822666
- Emergency Duty Team (out of hours): 01905 768020

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 Community-based early help and Family Help

The Trust recognises that early intervention can prevent concerns from escalating.

Where a child and family would benefit from support below the statutory social care threshold, the academy will work with the family and relevant agencies to access appropriate community-based early help or Family Help in accordance with local arrangements.

The DSL (or a deputy) will ensure:

- the child's needs are assessed appropriately;
- the views and wishes of the child are considered;
- information is shared appropriately;
- actions and timescales are clearly recorded;
- progress is reviewed;
- concerns are escalated where needs are not being met or risk increases.

Family or Early Help should not delay a referral to children's social care where a child is suffering, or is likely to suffer, significant harm.

If family or early help is appropriate, the DSL or a deputy 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 or a deputy 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. Where a referral does not receive an appropriate response, where agreed actions are not undertaken, or where concerns for a child remain, the DSL will challenge the decision and escalate concerns in accordance with the relevant local safeguarding partnership's Professional Differences, Professional Challenge or Escalation Procedure. Escalation will occur without delay where there are concerns that a child may be at risk of harm.

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 defined in the Terrorism Act 2000 as the use or threat of action where the action:
 - involves serious violence against a person;
 - involves serious damage to property;
 - endangers a person's life (other than that of the person committing the action);
 - creates a serious risk to the health or safety of the public or a section of the public; or
 - is designed to seriously interfere with or seriously disrupt an electronic system.
- The use or threat must be designed to influence the government or intimidate the public (or a section of the public) and be made for the purpose of advancing a political, religious, racial, 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 or a deputy first to agree a course of action.

If in exceptional circumstances the DSL or a deputy 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 colleague, supply staff member, trainee teacher, contractor, volunteer or other adult working with children, 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

Child-on-child/peer-on-peer abuse includes, but is not limited to, bullying, harassment, sexual harassment, sexual violence, harmful sexual behaviour, physical violence, coercive behaviour, image-based abuse, making or sharing nudes or semi-nudes, online abuse, initiation or hazing, exploitation and abuse relating to prejudice or discrimination.

The academy will consider the needs and safety of all children involved, including the child who has experienced harm and the child alleged to have caused harm. A child who causes harm may also be experiencing abuse or other safeguarding concerns and these will be explored where appropriate. 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 safeguarding and child protection 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:

- Any member of staff receiving the allegation must listen carefully, reassure the child, make an accurate record of the concern, and report it immediately to the DSL or a deputy; staff must not investigate it themselves;
- The DSL will undertake an initial assessment of the concern and determine the appropriate next steps. Where necessary, they will seek advice from Children’s Social Care, the Police, and/or other relevant agencies;
- The DSL will consider the nature, seriousness and context of the incident including:
 - whether the behaviour constitutes harmful sexual behaviour;

- the age, developmental stage and capacity of the children involved;
- issues relating to consent, recognising that a child may not be legally or developmentally able to give consent;
- any power imbalance between those involved, including differences in age, gender, size, maturity, social status, ability, SEND, vulnerability, or authority;
- whether the behaviour took place online, offline or involved both;
- whether the behaviour was an isolated incident or part of a pattern of repeated behaviour;
- the impact on the victim and any wider impact on other students, groups of students or the wider academy community;
- whether the alleged perpetrator may also be experiencing abuse, exploitation, trauma, or other vulnerabilities requiring safeguarding support.
- Appropriate support will be provided to both the victim and the alleged perpetrator. Support for the alleged perpetrator will not diminish the school's responsibility to safeguard and support the victim.
- The DSL will consider whether referrals to external agencies, including Children's Social Care, CAMHS, health services, family or early help services or specialist support organisations, are required.
- The Trust will ensure that the wishes of the victim are carefully considered when determining how the matter is managed, whilst balancing its safeguarding responsibilities and the need to protect other children.
- At the start of each academic year, and through ongoing safeguarding training, the DSL will ensure that all staff understand the indicators of child-on-child abuse, their responsibilities for reporting concerns and the procedures to follow when concerns arise.
- The Trust will minimise the risk of child-on-child/peer-on-peer abuse by:
 - maintaining a culture of respect, safety, and inclusion;
 - challenging inappropriate, abusive, derogatory, discriminatory, sexist, misogynistic, homophobic, biphobic, transphobic or sexualised language and behaviour;
 - responding promptly to incidents of bullying, prejudice-based behaviour, and sexual harassment;
 - educating students through the curriculum, assemblies, tutorials and enrichment activities about healthy relationships, boundaries, consent, respect, and online safety;
 - being vigilant to behaviours that may disproportionately affect particular groups, including sexual harassment and sexual violence affecting girls and initiation, hazing or other abusive behaviours affecting boys;
 - ensuring students know how and where to seek help, including how to report concerns confidentially;
 - ensuring staff understand that children who display harmful behaviour towards others may themselves be vulnerable or experiencing abuse, and that these concerns require an appropriate safeguarding response;
 - maintaining effective recording, monitoring and risk assessment arrangements for all child-on-child/peer-on-peer abuse concerns.

7.11 Making or sharing nudes or semi-nudes

All incidents involving the making or sharing of nudes or semi-nudes by or involving children must be treated as safeguarding concerns. This includes images or videos that appear to have been created or shared consensually.

The DSL will consider the circumstances, age and development of the children involved, consent, coercion, pressure, exploitation, threats, blackmail, distribution, the involvement of adults, and any wider safeguarding concerns.

Staff must not view, download, copy, save, forward or otherwise distribute the imagery. Staff should report the concern to the DSL immediately and record the concern without including the image itself.

The procedure also applies to digitally altered or AI-generated intimate images, including deepfake images.

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 youth produced sexual imagery (also known as 'sexting'), 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 the 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 that technology plays a significant role in children's lives and that online activity can present safeguarding and wellbeing risks as well as educational opportunities. Safeguarding incidents and concerns can occur both online and offline and children may be vulnerable to abuse, exploitation, bullying, radicalisation, harmful content, criminal exploitation, and harmful sexual behaviour through their use of technology.

The Trust and its academies are committed to creating a culture of safe and responsible technology use and will take a whole-school approach to online safety that protects and educates students, staff, volunteers, Trustees, parents, and carers.

To achieve this, the Trust and its academies will:

- maintain robust processes to safeguard students and adults when using technology;
- educate students about online safety through a broad and age-appropriate curriculum;
- promote safe, responsible, and respectful behaviour online;
- establish clear procedures for identifying, reporting, managing, and escalating online safety concerns;
- maintain clear expectations regarding the use of mobile phones, smart technology, and personal devices;
- work in partnership with parents and carers to promote safe and responsible technology use.

Students will be taught about online safety, including:

- the safe and responsible use of the internet, social media, and digital technologies;
- keeping personal information secure;
- recognising online abuse, exploitation, coercion, and manipulation;
- cyberbullying and online harassment;
- healthy online relationships and digital boundaries;
- misinformation, disinformation, and fake content;
- how to report concerns and seek support, including where they witness harmful behaviour towards others.

The Trust and its academies will provide regular online safety information and guidance to parents and carers and will ensure that they know how to raise concerns about online safety or safeguarding.

All staff will receive training on online safety as part of their induction and through regular safeguarding updates. Training will include online abuse, cyberbullying, online radicalisation, professional use of technology, filtering and monitoring arrangements, and emerging risks associated with new technologies.

Filtering and Monitoring

The Trust and its academies will implement appropriate filtering and monitoring systems to safeguard students when using academy technology and networks. These arrangements will seek to limit exposure to harmful or inappropriate content and assist in identifying safeguarding concerns.

The effectiveness of filtering and monitoring systems will be reviewed at least annually by the senior leader responsible for safeguarding and online safety, with input from the DSL and appropriate IT staff. The review will consider the effectiveness of filtering and monitoring across all relevant devices and locations, including remote access where applicable. The review and any actions arising from it will be recorded.

Artificial Intelligence

The Trust recognises that advances in artificial intelligence create both educational opportunities and safeguarding risks. Potential risks may include:

- the creation, manipulation, or distribution of sexual imagery;
- AI-generated or AI-manipulated deepfake content;
- grooming, coercion, and exploitation;
- misinformation and disinformation;
- impersonation and fraud;
- privacy and data protection concerns;
- access to harmful, inappropriate, or misleading content.

Any concern involving AI-generated or AI-manipulated sexual imagery involving a child will be treated as a safeguarding matter, reported immediately to the DSL and managed in accordance with the Trust's procedures for responding to incidents involving the making, possessing or sharing of nude or semi-nude images.

Mobile Phones and Smart Devices

Each academy will have clear arrangements governing the use of mobile phones, smart devices and other personal technology by students, staff, volunteers, and visitors. These arrangements will promote safeguarding, support learning, protect privacy and reduce the risk of inappropriate recording, sharing of content or communication.

Staff may bring personal mobile phones onto academy premises but must use them in accordance with the relevant academy policy. Personal devices must not be used to photograph, record or store images of students, and any necessary recording of students must only take place using authorised academy equipment and procedures.

Students, staff, volunteers, Trustees, parents, and carers will be made aware of expectations relating to acceptable use of technology and academy ICT systems. Appropriate sanctions may be applied where these expectations are breached.

The Trust and its academies will ensure that staff understand their powers in relation to searching, screening and confiscation and will act in accordance with current statutory guidance where concerns arise.

Further information regarding online safety, filtering and monitoring, acceptable use, and the use of mobile phones and personal devices can be found in the relevant academy's Online Safety Policy, Acceptable Use Agreements and Mobile Phone Policy.

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.

Staff must not contact parents or carers about a safeguarding concern unless this is part of their role and has been agreed with the DSL, unless immediate action is required to protect the child.

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 disproportionately 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.

Children with medical conditions may also face additional safeguarding risks or barriers to communicating concerns. Staff should not assume that changes in behaviour, attendance, mood, or physical presentation are solely related to a medical condition and should maintain professional curiosity.

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 policies 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 relating 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.

Safeguarding effectiveness will be monitored through a combination of quantitative and qualitative evidence, including safeguarding audits, case file audits, training compliance, safer recruitment audits, attendance data, referral and escalation data, low-level concern monitoring, filtering, and monitoring reviews, student voice, and feedback from external agencies. Findings will be used to identify improvements and inform the Trust safeguarding development plan.

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.

Where a child moves to another school or college, the child protection file will be transferred securely and promptly. The receiving setting will be provided with sufficient information to understand current safeguarding needs and any actions required. Where appropriate, the DSL will communicate directly with the receiving DSL to support continuity of safeguarding arrangements.

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 confirm they have read, understood, and agree to abide by the principles outlined in **Part One of Keeping Children Safe in Education 2026**.

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. Safeguarding updates will reflect emerging local and national safeguarding risks, including online harms, artificial intelligence, exploitation, harmful sexual behaviour, serious violence, domestic abuse, mental health, and other risks identified through the Trust's safeguarding data and contextual safeguarding assessment.

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.

DSLs will keep up to date with changes to local safeguarding arrangements, Family Help and referral pathways, information-sharing requirements, and emerging safeguarding risks.

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 2026**, 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
31/08/26	Autumn 2026	Autumn 2026	Autumn 2026	August 2027	

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 as far 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 frightened 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 caregivers)
 - 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 occur 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 with children includes relevant teaching, training, instructing, caring for, or supervising children where the frequency or period condition is met. From 1 September 2026, the previous exemption for activities carried out under supervision no longer applies.

The Trust will assess whether paid staff, volunteers and other individuals are undertaking regulated activity and will obtain the appropriate DBS checks, including Children's Barred List information where legally applicable.

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/ukxi/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.

Where staff are supplied by an agency or other third party, the Trust and the supplying organisation retain shared responsibility for safeguarding. The Trust will ensure that concerns are reported promptly to the appropriate safeguarding lead and, where required, the LADO and relevant agencies.

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.

From 1 September 2026, the Trust will assess all volunteer roles against the revised definition of regulated activity with children. Where a volunteer is undertaking regulated activity, the Trust will obtain an Enhanced DBS check with Children's Barred List information before the individual undertakes the regulated activity, subject to the relevant legal requirements.

The fact that a volunteer is supervised by a member of staff will no longer, in itself, remove the activity from the definition of regulated activity.

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

The Trust and its academies recognise the educational value of work experience and will ensure that appropriate safeguarding arrangements are in place for all placements.

Prior to the commencement of a placement, the academy will satisfy itself that the placement provider has suitable arrangements in place to safeguard and promote the welfare of children and young people. This will include consideration of the provider's safeguarding and child protection arrangements, supervision arrangements, health and safety procedures, and the suitability of adults who will be working with the student.

The Trust and its academies will undertake a risk-based assessment of each placement, taking account of:

- the age, needs, and vulnerabilities of the student;
- the nature of the work and the environment in which it will be undertaken;
- the level, frequency, and nature of contact between the student and adults at the placement;
- the arrangements for supervision and oversight;
- whether any individual will be undertaking regulated activity in relation to the student;
- any safeguarding concerns identified through the placement planning process.

Where an individual supervising, teaching, training, instructing, caring for, or supervising a student is undertaking regulated activity, the Trust and placement provider will ensure that appropriate safer recruitment and vetting requirements have been met. The Trust will not permit

any person who is barred from working with children to undertake regulated activity involving its students.

In determining whether regulated activity applies, the Trust will consider the frequency and nature of the activity in line with current legislation and statutory guidance. The existence of supervision alone will not determine whether activity is regulated.

Where work experience takes place in a school, college or other specified educational establishment, consideration will be given to whether the role constitutes regulated activity and whether appropriate checks are required.

The academy will maintain appropriate communication with the placement provider throughout the placement and will ensure that students know how to report any safeguarding concerns arising before, during or after their work experience.

Any safeguarding concerns identified in relation to a work experience placement will be managed in accordance with this policy and, where appropriate, referred to Children's Social Care, the Police, or other relevant agencies.

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 contractors, supply teachers, volunteers, agency staff and trainee teachers, 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:

- The Chief Executive
- Deputy Chief Executive
- Director of Governance
- Principal - WSFC
- Principal – HSFC
- Principal – KEVI

- Head - The Chantry School
- Head - John Kyrle High School
- HoM Chief Financial Officer
- Whomever the Trust may decide, from time to time, in accordance with the Scheme of Delegation.

Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child is or other children 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 Human Resources' (HR) service and support through the Trust's Employee Assistance and Recognition Programme (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 HR Representative 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 HR Representative 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 Local Authority Designated Officer 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.

All low-level concerns will be recorded, reviewed, and considered collectively so that patterns or cumulative concerns can be identified. A low-level concern may become significant when considered alongside other information.

The fact that a concern does not meet the harm threshold does not mean that it should be disregarded.

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 2026 on page 161.

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 of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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.

For students aged 16–18, unexplained absence, withdrawal, or disengagement from education may indicate safeguarding concerns. Staff should consider whether the student may be experiencing abuse, exploitation, domestic abuse, homelessness, serious violence, mental health difficulties, substance misuse, forced marriage, FGM or other forms of harm.

Where a student stops attending without a known destination or explanation, the academy will follow its attendance, withdrawal and safeguarding procedures and consider whether information should be shared with relevant agencies.

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.

The National Information Centre on Children of Offenders (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.

CSE may involve an individual perpetrator, a group or an organised network and may occur entirely or partly online. Children may not recognise themselves as victims and may be criminalised for behaviour that has occurred as a result of coercion or exploitation.

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.

Where the academy participates in Operation Encompass, information received will be managed in accordance with the local Operation Encompass protocol and the academy's safeguarding procedures.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

This includes sofa surfing, temporary accommodation, unstable housing, and situations where a young person is at risk of becoming homeless.

The DSL/DDSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it.

If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. 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 fmf@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, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. The Trust also recognises the Government's 2024 definition of extremism as the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to negate or destroy the fundamental rights and freedoms of others, undermine or replace the UK's system of liberal parliamentary democracy, or create a permissive environment for others to do so.

The Trust and its academies have a duty under Section 26 of the Counterterrorism and Security Act 2015 (the Prevent Duty) to have due regard to the need to prevent people from being drawn into terrorism. Protecting children from the risk of radicalisation is part of the Trust's wider safeguarding responsibilities and should be approached in the same way as protecting children from other forms of harm, abuse, or exploitation.

The DSL will undertake appropriate Prevent training and ensure that staff receive training and updates that enable them to identify children who may be vulnerable to radicalisation and know how to respond appropriately. Staff should understand that concerns relating to radicalisation are safeguarding concerns and should be managed through safeguarding procedures rather than disciplinary processes.

The Trust and its academies will assess the risk of children being drawn into terrorism or extremist activity. This assessment will be informed by an understanding of local risks, local authority guidance, local safeguarding partnership arrangements, police information and national guidance. Appropriate measures, including filtering and monitoring systems, will be implemented to reduce the risk of children accessing harmful extremist or terrorist content online.

There is no single indicator that identifies a child who may be susceptible to radicalisation. Radicalisation can occur over an extended period or over a much shorter timescale. Staff should be alert to changes in behaviour and presentation that may indicate a child requires support, including:

- refusal to engage with, or becoming abusive towards, people who are different from themselves;
- increased susceptibility to conspiracy theories or feelings of persecution;
- significant changes in friendship groups, appearance, or behaviour;
- withdrawal from activities previously enjoyed;
- isolation from family members or established friendship groups;
- the use of scripted or rehearsed language;
- an unwillingness or inability to discuss personal views openly;
- increased anger, intolerance, or disrespect towards others;
- increased secrecy, particularly regarding internet use;
- expressions of support for extremist ideologies, groups, or individuals;
- accessing extremist materials online;
- possession of extremist literature or content;
- contact with extremist recruiters or attempts to engage with extremist organisations.

The Trust recognises that children who are vulnerable to radicalisation may also be vulnerable due to other safeguarding factors, including bullying, discrimination, social isolation, mental health concerns, exploitation, adverse childhood experiences, or unmet emotional needs. These indicators do not necessarily mean that a child is being radicalised and may reflect other safeguarding or welfare concerns. Staff should exercise professional curiosity and seek advice whenever they have concerns.

Where a member of staff has concerns that a child may be vulnerable to radicalisation, they must report these concerns promptly to the DSL in accordance with the Trust's safeguarding procedures. The DSL will consider the level of risk and determine whether support can be provided through the academy's pastoral and safeguarding processes or whether a referral to external agencies is required.

Where appropriate, the DSL may make a referral to Channel, the multi-agency programme which provides voluntary early intervention and support for individuals who may be vulnerable to being drawn into terrorism. A Channel referral is a safeguarding response and is intended to provide support before concerns escalate.

The Trust's academies will follow the referral pathways and Prevent arrangements applicable within their local authority area and will work with safeguarding partners, Prevent teams, children's social care, the police, and other relevant agencies where concerns arise.

Further information about preventing radicalisation and extremism can be found in the Trust's Behaviour Policy, Online Safety Policy, Relationships Education/RSE arrangements and other safeguarding procedures.

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.

Where a visitor is attending in a professional capacity, the academy will determine what safeguarding checks are appropriate based on the nature of the visit, the individual's role and whether they will have contact with children.

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) occurs where an individual, group or organised criminal network takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity in exchange for something the child needs or wants, for the financial or other benefit of the perpetrator, or through violence, threats, intimidation or other forms of coercive behaviour.

The victim may have been criminally exploited even where the activity appears consensual. Children involved in criminal exploitation are victims of abuse and should be recognised and supported as such. They may be subject to grooming, coercion, control, stalking, intimidation, threats, debt bondage, violence, or the threat of violence. CCE does not always involve physical contact and can occur both

online and offline, including through social media, gaming platforms, messaging services, and other forms of technology.

CCE can involve children being forced or coerced into carrying drugs, money, or weapons across local authority boundaries (county lines), working in cannabis cultivation, shoplifting, pickpocketing, fraud, theft, violence, or other criminal activities. Organised exploitation may be perpetrated by individuals, gangs or wider criminal networks operating locally or across multiple areas.

Perpetrators may use online platforms to identify, groom and recruit children and may target those who are vulnerable due to social isolation, family circumstances, special educational needs and disabilities, mental health difficulties or previous experiences of abuse or neglect.

Criminal exploitation may also involve children being used to facilitate 'cuckooing', where the home of a vulnerable person is taken over and used by criminals for activities such as drug dealing, storage of weapons or other illegal activity. Some children may be drawn into situations involving serious violence, gang-related activity or the carrying and use of weapons.

Indicators of CCE may include:

- the possession of unexplained gifts, money, clothing, mobile phones, or other possessions;
- association with individuals or groups known to be involved in exploitation or criminal activity;
- changes in emotional wellbeing, presentation, behaviour, or school engagement;
- drug or alcohol misuse;
- going missing, being absent from home for periods of time or frequently returning home late;
- unexplained travel or movement between locations;
- regular absence from education or disengagement from learning;
- evidence of coercion, intimidation, controlling relationships or fear of particular individuals or groups;
- involvement in incidents of serious violence or possession of weapons;
- increased secrecy, the use of multiple mobile phones or concerning online activity.

Staff should be aware that children who are criminally exploited may themselves appear to be offending or engaging in anti-social behaviour. However, they should be viewed as potential victims of exploitation and abuse, and a safeguarding response should always be considered.

Child-to-Parent/Carer Abuse

Child-to-parent/carers abuse is any behaviour by a child or young person that is intended to control, coerce, threaten, or harm a parent, carer, or other family member. It can involve physical violence, verbal abuse, emotional manipulation, damage to property, intimidation, financial abuse, or controlling behaviour.

Child-to-parent/carers abuse can occur in families of any background and may have a significant impact on the wellbeing and safety of those affected.

Practitioners should be aware that a child displaying abusive behaviour may themselves have unmet needs or have experienced trauma, abuse, or neglect.

Verbal and Emotional Abuse

Verbal and emotional abuse involves the persistent use of words, actions or behaviour to control, intimidate, criticise, humiliate, threaten, or undermine another person's self-worth and emotional wellbeing.

Examples may include insults, threats, bullying, intimidation, manipulation, isolation, humiliation, coercive behaviour, and repeated negative comments.

Verbal and emotional abuse can occur in person, online or through digital communications and may have a significant impact on a child's mental health, development, and wellbeing.

Serious Violence

Serious violence refers to acts of violence that cause, or have the potential to cause, significant physical or psychological harm. It may involve weapons, gangs, organised criminal activity, assault, robbery, or other violent offences.

Some children and young people may be at increased risk of becoming victims of, or being drawn into, serious violence due to factors within their home, social or community environment.

Indicators of risk should always be considered within the context of the child's circumstances and wider safeguarding needs.

Stalking

Stalking is a pattern of unwanted, repeated, and obsessive behaviour directed towards another person that causes them fear, distress, or concern for their safety.

Stalking behaviours may include repeatedly following someone, monitoring their activities, unwanted contact, sending messages, or gifts, tracking online activity, gathering information about them, or making threats.

Stalking can occur both online and offline and may be committed by adults or young people.

It is a criminal offence.

Mental Health and Safeguarding

All staff should be aware that mental health concerns can, in some cases, be an indicator that a child has experienced or is at risk of abuse, neglect or exploitation.

Children may experience a range of emotional, psychological, or behavioural difficulties that affect their wellbeing, relationships, attendance, and engagement with learning.

While only appropriately qualified professionals can diagnose mental health conditions, staff are well placed to identify concerns, offer support, and take action where safeguarding issues may be present.

Early intervention and appropriate support can help to reduce risk and improve outcomes for children and young people.

Financial Exploitation

Financial exploitation occurs when a person manipulates, deceives, coerces, or pressures another individual to gain access to money, property, possessions, or financial resources for their own benefit.

Children and young people may be targeted by criminal groups, peers, family members, or others who seek to exploit them financially through fraud, theft, coercion, criminal activity, or debt.

Financial exploitation is often associated with other forms of abuse, including criminal exploitation and county lines activity.

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.

This section should be read alongside the Trust's procedures for image-based abuse and the making or sharing of nudes and semi-nudes.

Children and Online Safety Away from Education

Children's online activity outside of educational settings forms an important part of their daily lives and can present both opportunities and risks.

Abuse, harm and exploitation can occur online at any time and may involve cyberbullying, grooming, online coercion, sexual abuse, radicalisation, criminal exploitation, fraud, or the sharing of harmful content.

Children may be particularly vulnerable when accessing online platforms, gaming services, social media, and communication applications outside school hours and away from direct supervision.

Staff should recognise that safeguarding incidents affecting children online can take place both within and outside educational settings and may require an appropriate safeguarding response.

Online Safety

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 four 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

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 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	Phil Tranter	pit@hereford.ac.uk
	Gemma Cosgrove-Ball	g.cosgrove-ball@hereford.ac.uk
	Trish Donnelly	t.donnelly@hereford.ac.uk
	Tracy Elson	tracy.elson@hereford.ac.uk
	Jules Price Hutchinson	jph@hereford.ac.uk
	Jade Finney	j.finney@hereford.ac.uk
Nominated Governor	Catriona Ward	
Local Authority Designated Officer (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
	Rachel Briggs	rachel.briggs@wsfc.ac.uk
	Ellie Clayton	eleanor.clayton@wsfc.ac.uk
	Catherine McPherson	catherine.mcpherson@wsfc.ac.uk
	Catherine Power	catherine.power@wsfc.ac.uk
Nominated Governor	Elle Beale	
LADO		Refer via LADO - Managing Allegations @ Worcestershire County Council
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	Laura Day	laura.day@kedst.ac.uk
	Stuart Parkes	stuart.parkes@kedst.ac.uk
	Lowri Saenger	lowri.saenger@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
	Nikki Hadley	nikki.hadley@kedst.ac.uk
	Clare Bramall	clare.bramall@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

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
	Luke Moseley	lukemoseley@jkhs.org.uk
	James Bolt	j.bolt@jkhs.org.uk
	Fiona Moore	f.moore@jkhs.org.uk
	Sarah Mountford	s.mountford@jkhs.org.uk
Nominated Governor	Maira Lee	m.lee@jkhs.org.uk
LADO	Terry Pilliner	lado@herefordshire.gcsx.gov.uk

The Chantry School

Role	Name	Email
Designated Safeguarding Lead	Jon Hill	jhill@chantryschool.com
	Samantha Blunt	sblunt@chantryschool.com

Deputy Designated Safeguarding Leads	Leah Drust	ldrust@chantryschool.com
	Dave Lewis	dlewis@chantryschool.com
	Nicola Clear	nclear@chantryschool.com
Nominated Governor	Jen Harrison	jharrison@chantryschool.com
LADO		Refer via LADO - Managing Allegations @ Worcestershire County Council