CARLTON
ACADEMY TRUST

Safeguarding and Child Protection Policy

Approved on behalf of Trustees	**Gareth Logan**
Date:	**July 2026**
Next Review	**July 2027**

Glossary of Terms

AEP: Alternative Education Provision
CAMHS: Child and Adolescent Mental Health Services
CCE Child Criminal Exploitation
CEO: Chief Executive Officer
COT: Chair of Trustees
CME: Child Missing from Education
CSC: Children's Social Care (Local Authority)
CSE Child Sexual Exploitation
DBS: Disclosure and Barring Service
DDSL Deputy Designated Safeguarding Lead
DLAC: Designated teacher for Looked After Children.
DOSP: Trust Director of Safeguarding and Pastoral
DSL: Designated Safeguarding Lead (must be part of the SLT)
EAL: (Student with) English as an Additional Language.
EHCP: Education Health Care Plan
EHE: Elective Home Education (student)
EYFS: Early Years Foundation Stage
FGM: Female Genital Mutilation
KCSIE: Keeping Children Safe in Education (DFE guidance)
HOS: Head of School
LA: Local Authority
LAC: Looked After Child/Children
LADO: Local Authority Designated (Safeguarding) Officer
Parents: Umbrella term also including carers and legal guardians
PLAC: Previously Looked After Child/Children
PRU Pupil Referral Unit
SCR Single Central Record
SEND: Special Educational Needs or Disabilities
SENDCO: Special Educational Needs Co-ordinator
SLT: Senior Leadership Team
TRA: Teacher Regulation Agency
VSH: Virtual School Head

Section 1: Policy Aims, Definitions and Responsibilities

This policy applies to all staff, volunteers, trainee teachers, visitors, trustees, members or governors. It provides guidance for the effective safeguarding of students both in-school and off-site.

Policy Objectives

- Provide help and support to meet the needs of children as soon as problems emerge.
- Ensure staff are aware of their statutory responsibilities and properly trained to recognise and report safeguarding issues, including prejudice-based harm.
- Outline procedures for identifying and reporting cases or suspected cases of abuse in a timely manner.
- Establish an inclusive, respectful and anti-discriminatory environment where students feel secure, valued and encouraged to talk and listened to and have adults in school who they feel confident of approaching if they have safeguarding concerns.
- Provide guidance to ensure all schools practise safer recruitment methodologies.

Definitions

Safeguarding is the responsibility of all staff and comprises:

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

Child Protection is defined as activities undertaken to prevent children suffering, or being likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is the maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Abuse can occur online or offline and may be perpetrated by an adult or another child, including through child-to-parent or care giver abuse. It includes physical, emotional and sexual abuse, and neglect.

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

Regulated Activity: Work undertaken by an individual which involves close and regular contact with children and requires statutory safeguarding checks. This includes:

- Providing teaching, training, instruction, care or supervision of children on a regular basis.
- Carrying out work which provides regular opportunities for contact with children.
- Providing personal care or health care to children.
- Working in roles which otherwise meet the definition of regulated activity as set out in current legislation and statutory guidance.

Legislation and Statutory Guidance

This policy is based on DfE statutory guidance, *Keeping Children Safe in Education 2026* and *Working Together to Safeguard Children 2023*. Where applicable, it also reflects the *Early Years Foundation Stage Statutory Framework (2025)* and local safeguarding partner arrangements.

It is also compliant with the:

- Equality Act 2010.
- Human Rights Act 1998.
- Public Sector Equality Duty
- Filtering and Monitoring Standards for Schools and Colleges

Responsibilities

Trustees must be:
- Familiar with all sections of KCSIE.
- Review and approve this policy, ensuring it complies with legislation.
- Holding senior Trust leaders and HOS accountable for its effective implementation.

All Staff (including those who do not work directly with children)

- Read and ensure they understand part 1 and Annex A of KCSIE 2026.
- Be familiar with this policy and familiar with the types and signs of abuse, neglect, and other safeguarding harms.
- Be alert to the signs and impact of prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination.
- Be aware of the identity of the school DSL (and DDSL where relevant).
- Know what actions to take when they have safeguarding concerns, a safeguarding issue arises, or a student makes a safeguarding disclosure.
- Have an awareness that children may not feel ready, know how to make a disclosure, or may not recognise their experiences as harmful.
- Be aware of Trust expectations and responsibilities in relation to online filtering and monitoring.

The **DOSP** has operational responsibility for the effective development, implementation and quality assurance of trust systems for safeguarding and child protection.

The **DSL** must ensure that their identity is known by all staff and students, being prominently displayed around school. Main responsibilities include:

- Supporting and advising staff.
- Take part in strategy discussions, inter-agency meetings, or support other staff undertaking these responsibilities.
- Leading responses to safeguarding disclosures, incidents, or risks.
- Making referrals (where necessary) to relevant agencies (LA CSC; Channel programme; DBS; police)
- Keeping HOS informed of any key issues or safeguarding risks.
- Effective liaison with LADO or LA case managers.
- Complete regular Safeguarding Supervision.
- Promote the educational outcomes of children with a social worker.

Main responsibilities of the **HOS** are to ensure:

- Staff (including temporary) and volunteers are aware of school/trust safeguarding systems.
- All staff undertake appropriate safeguarding and child protection training.
- Publishing the Safeguarding and Child Protection policy on the school website.

- The DSL has appropriate time, training, and resources to adequately fulfil their role.
- There are adequate cover arrangements when the DSL is absent from school.
- EYFS: Each child is assigned a key person.
- Relevant staff ratios are met where applicable.
- Robust cover arrangements are in place to ensure safeguarding concerns are received, monitored and acted upon without delay when the DSL is unavailable.

Section 2: Students at Risk of Harm or Causing Concern; Safeguarding Disclosures

When a student is suffering harm, likely to suffer harm, or in immediate danger, an immediate referral must be made to CSC and/or police. Any member of staff can make a referral using the following contact details:

Bradford:

LA Children's Services Dedicated Practitioners Advice and Referral contact line: 01274 433999 (Monday to Thursday 8.30am – 5.00pm, Friday 8.30am – 4.30pm.
Emergency Duty Team (out of hours): 01274 431010

Leeds:

Duty and Advice Team – 0113 376 0336 (during office hours 9:00am to 5:00pm) or the Children's Emergency Duty Team (out of hours): 0113 535 0600

If you believe a child is at IMMEDIATE RISK OF HARM, contact police (999).

The DSL must be informed as soon as possible thereafter.

Student Disclosures

Students can report concerns through Trusted adults, safeguarding email addresses, online reporting systems and designated safeguarding staff.

If a student makes a safeguarding disclosure staff MUST**:**

- Listen and be open to what they are saying, allowing them time to talk freely without asking leading questions.
- Stay calm and do not appear shocked or upset.
- Assure that they have done the right thing, never telling them they should have said something sooner.
- Explain that you cannot keep the disclosure secret and must refer it on (DSL).
- Complete notes of the disclosure without delay following using the student's own words, remaining factual, and not adding your own interpretation of events. This should be signed, dated, referred to the DSL and formally recorded.
- Make an immediate referral to CSC and/or the police (where appropriate – immediate risk of harm).

Vulnerable Groups

Potentially vulnerable groups include:

- SEND or Health Issues (including mental health): The identification of abuse and neglect of these children is made more difficult due to their communication difficulties, tendency to be socially isolated, and different behavioural indicators of abuse. Mental health issues may be an indicator of abuse.
- LAC, PLAC, privately fostered, in kinship care or with social worker support.

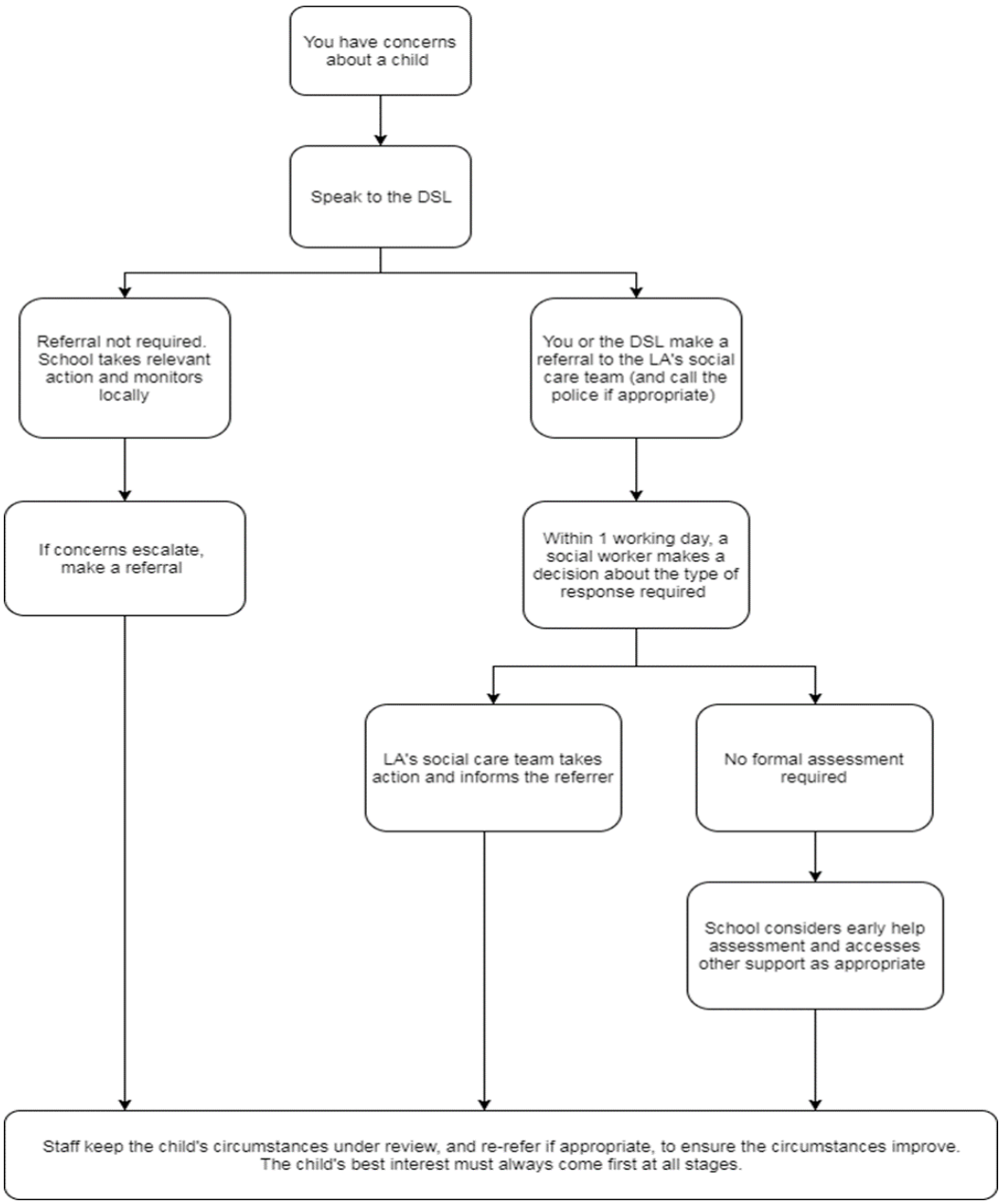
- Young carers.
- Those engaging in anti-social or criminal behaviour; taking alcohol or drugs.
- Those at risk of radicalisation, sexual or criminal exploitation, serious violence, trafficking, or modern slavery.
- Students frequently missing from school, home, or care.
- Students with severe behaviour challenges (multiple suspensions or at risk of exclusion; attending AEP or PRU).
- Has a parent in custody or affected by parental offending.
- Children in challenging family circumstances: substance abuse; adult mental health issues, domestic abuse; temporary accommodation.
- Those at risk of 'honour' based abuse such as FGM or forced marriage.
- EAL.
- Those who experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Asylum seekers.
- EHE students.
- Has returned to their family home from care.
- Pregnant children and young parents.
- Children displaying abusive, violent or harmful behaviour towards others.
- Children experiencing child-to-parent or child-to-carer abuse.
- Children who are questioning their gender, as they may be vulnerable to bullying, harassment, discrimination, self-harm, online harms or poor mental health.

Family Help

Family Help provides early support to children and families where additional needs have been identified. Staff must report concerns to the DSL, who will coordinate support and make referrals where appropriate. Where risks escalate or significant harm is suspected, a referral to CSC will be made.

Student Concerns

If staff have concerns about a child, they must report these to the DSL or DDSL as soon as reasonably possible, no matter how small or trivial. The following flowchart should be used to guide responses:



LA CSC will decide next steps within one day when a referral is made. This must then be formally recorded. Where circumstances do not improve following a referral, the DSL should follow escalation procedures to ensure concerns are properly addressed.

The DSL must report any concerns or disclosures with parents as soon as reasonably practicable, except where we believe that doing this would increase risks to a student. Other staff members can only do this following authorisation from the DSL.

The DSL will liaise with other agencies when early intervention is required. They should then keep cases under review and consider referral to CSC if circumstances do not improve.

Section 3: Recognising Abuse and Taking Action

All staff must be able to identify and recognise all forms of abuse, neglect, and exploitation.

Types of Abuse

There are four main types of abuse which may occur in isolation or combination.

Physical Abuse: Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm, (parent) falsifies symptoms or deliberately induces illness in a child.

Emotional Abuse: Persistent maltreatment of a child to cause severe adverse effects on their emotional development. Examples include:

- Conveying to a child they are worthless, unloved, inadequate, or valued only as far as they meet the needs of another person.
- Not providing opportunities for a person to express their views, deliberately silencing them, ridiculing what they say or how they communicate.
- Age or developmentally inappropriate expectations imposed on a child, including interactions that are beyond a child's developmental capability; overprotection; limiting exploration and learning; preventing a child participating in normal social interactions.
- Witnessing the ill-treatment of others.
- Bullying (including cyberbullying) or causing a child to frequently feel frightened or in danger.
- Exploitation or corruption.
- Persistent verbal abuse, humiliation, belittling, criticism, rejection, scapegoating, intimidation and name-calling.

Sexual Abuse: Involves forcing, causing or enticing a child to take part in sexual activities irrespective of whether the child is aware of what is happening. This includes:

- Physical contact including assault by penetration including rape or penetration with an object or non-penetrative acts such as masturbation, kissing, rubbing, and touching the outside of clothing.
- Non-contact activities such as children looking at or producing 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).
- Children may be sexually abused within the family, an institution or a community setting and are often known to the perpetrator. Children under 13 cannot consent to sexual activity, and sexual activity with a child under 16 is a criminal offence regardless of apparent consent.

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

- Neglect during pregnancy due to maternal substance abuse.
- Failure to provide adequate food, clothing, and shelter; exclusion from home or abandonment.
- Not protecting a child from physical and/or emotional harm or danger.
- Failure to ensure adequate supervision, including the use of inadequate caregivers.
- Failure to ensure access to appropriate medical care or treatment.
- Being unresponsive to a child's basic emotional needs.
- Failure to provide suitable education.

Allegations Against Staff

If you have concerns or receive information about a member of staff posing a risk of harm to children, this must be reported to the Head of School without delay (see Allegations of Abuse Against Staff policy for further details).

Allegations are investigated when staff may have behaved in a way that has harmed, may have harmed a child, or may pose a risk of harm; indicate they are not suitable to work with children; or may have committed a criminal offence against or related to a child. This applies to conduct in and out of school.

Allegation investigations have three stages:

1) The Case Manager and LADO discuss the allegation and agree actions.
2) Alleged perpetrator informed of the allegation and next steps.

Note: Where the police and/or CSC are involved, the Case Manager will only share such information as advised.

3) Consider whether suspension is appropriate. Where the decision is to suspend, the staff member should be informed without delay and provided with a named contact at the school or trust.

Note: All suspension decisions (suspend or not) must be formally recorded, detailing reasons.

Allegations made against former staff should be referred to the LADO.

Where no further action is needed, the decision and reasons must be formally recorded by the LADO, including any follow-up actions for the alleged perpetrator and victim/s.

When further action is required, the school will take actions as advised by the LADO, police, and CSC, as appropriate which include:

- Suspending the member of staff.
- Appointing a named representative who will support the member of staff throughout the disciplinary process.
- Informing the parents of the child/children involved (with advice from police or CSC).
- Referral to the DBS where there has been conduct that has harmed, likely to harm, or pose a risk to children.
- Inform Ofsted of any allegations of serious harm (EYFS Students) or abuse by any person living, working, or looking after children, and actions taken in respect of these allegations. This notification must be made without delay and within 14 days.

Suspensions

Suspension should only be considered in the following circumstances:

- Child/children at risk of harm.
- Circumstances may constitute grounds for dismissal.
- There are no reasonable alternatives, such as redeployment.

When redeploying suspended staff within the same school, care must be taken to ensure that they do not have direct contact with the concerned child/children. This may necessitate moving the child/children to classes where they will not be in contact with the member of staff. It must be made clear this is not a punishment and agreed in consultation with parents.

Other adjustments include ensuring other staff members are present when they are in contact with children, working in a role where there is no contact with children, or working at a different school site.

There are five possible investigation outcomes:

- **Substantiated:** Sufficient evidence to prove the allegation.
- **Malicious:** Allegations disproven and there has been a deliberate act to deceive.
- **False:** Allegation disproved.
- **Unsubstantiated:** Insufficient evidence to either prove or disprove the allegation.
- **Unfounded**: No evidence to support the allegation.

Note: Where an allegation is made against a supply teacher, contractor or volunteer, the school/Trust cannot institute disciplinary procedures but must fully co-operate with any external investigation.

Actions Following a Criminal Investigation

The Case Manager will advise further action. When someone is found guilty, the Case Manager will take advice from the DOSP and LADO as to whether it is necessary to refer to DBS for inclusion on the barred list or referral to the TRA. The DOSP and LADO will determine whether lessons can be learned, and improvements made to safeguarding procedures.

Proper consideration should be made for the welfare of staff returning to work following suspension, particularly in relation to working with student/s who made the allegation. Schools also need to consider what sanctions should be applied against student/s found to make malicious allegations. If a malicious allegation is made by someone who is not a student at the school, it may be appropriate to make a complaint to the police.

Confidentiality

The school must maintain full confidentiality when managing safeguarding allegations. The Case Manager (on advice from LADO, DOSP, police, and CSC as appropriate) will make all parties aware of confidentiality requirements and responsibilities, and how to manage speculation, leaks, or media interest.

Record-Keeping

Schools must maintain full records of all allegations including details of the incident/s; findings; decisions made and justifications. Records are confidentially retained in the employee's personnel file until they reach normal pensionable age, or ten years have elapsed since the allegation. Malicious allegations must not be recorded in their personnel file. Any employer references must not refer to false, unsubstantiated, or malicious allegations.

Low-level Concerns

Are allegations or concerns that are inconsistent with the school code of conduct but do not meet the harm threshold or require LADO referral. Concerns may arise through suspicion, complaints, disclosures, or pre-employment checks. Examples include:

- Being overly friendly.
- Having favourites.

- Taking photographs of children.
- Engaging with a child on an individual basis in a secluded area or behind a closed door.
- Humiliating students.

All concerns must be investigated and formally recorded with details of how it was raised, action/s taken and reasons.

It is important to develop a culture of openness, trust, and transparency to encourage staff to report concerns. This is enhanced through:

- Ensuring staff are confident in distinguishing between expected and appropriate behaviour from concerning, problematic or inappropriate behaviours (themselves and others).
- Encouraging staff to self-refer or share concerns.
- Addressing unprofessional behaviour at an early stage in a sensitive and proportionate manner.
- Supporting staff to make corrections.

Records of low-level concerns should be under constant review from the DSL (and DOSP) so that patterns of concerning, problematic or inappropriate behaviour can be monitored. These are retained until the staff member leaves employment at the school/Trust. Concerns relating to an agency worker or contractor will be referred to their agency or employer, respectively.

Low level concerns will not be included in references, except where they have met the threshold for referral to the LADO and substantiated.

Section 4: Indicators of Abuse, Safeguarding Areas of Concern

Common signs of abuse include

- Significant behaviour changes.
- Extreme anger, sadness, aggressive or attention-seeking behaviour.
- Suspicious bruises with unsatisfactory explanations.
- Low self-esteem, self-harm and depression.
- Age inappropriate sexual behaviour.
- Sporadic or poor attendance.

Signs of **Abusive Relationships** include:

- Appearing frightened of parent/s.
- Acting in a way that is inappropriate for their age and development.
- Parents persistently avoiding services which benefit their child or treatment of their illness or condition.
- Unrealistic parental expectations.
- Parents frequently complaining about or to the child, failing to provide attention or praise.
- Parental absence.
- Parental substance abuse.
- Parents persistently refusing access during home visits.
- Domestic abuse.

Schools must also be aware of the potential risk when individuals previously known or suspected to have abused children move into the family home.

Common signs of **Physical Abuse** include:

- Explanations inconsistent with injury.
- Differing explanations for an injury.
- Unexplained delays in seeking treatment.
- Parents uninterested or undisturbed by an accident or injury.
- Parents absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries which may represent a “cry for help”.
- Using different doctors or hospitals.
- Reluctance to provide information or discuss previous injuries.

Signs of Abuse

Bites: Human bites are oval or crescent shaped, with those over 3 cm diameter likely to have been caused by an adult or older child.

Bruising: Non-accidental causes of bruising include:

- Bruising to pre-crawling or pre-walking babies.
- Bruising in or around the mouth (particularly in babies) which may indicate force feeding.

- Two simultaneous bruised eyes without bruising to the forehead (Single bruised eyes can either be accidental or indicate abuse).
- Bruising to the face, head, or places unlikely to be injured accidentally.
- Variation in colour of bruising which may indicate injuries caused at different times.
- Outline of objects (belt marks; handprints; hairbrush, etc).
- Bruising or tears around or behind the earlobe/s indicating injury by pulling or twisting
- Grasp marks.
- Bruising on arms, buttocks and thighs (possible sexual abuse).

Burns and Scalds: It is difficult to distinguish between accidental and non-accidental burns and scalds. Any burn with a clear outline is suspicious, as follows:

- Circular burns (cigarettes).
- Linear burns (hot metal rods or electrical fire elements).
- Burns of uniform depth over a large area.
- Scalds with a line indicating immersion such as a child getting into hot water. Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot bath or liquid.
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

Emotional Abuse

Signs are usually behavioural and include:

- Developmental delay.
- Abnormal nature or level of attachment between a child and parent.
- Aggressive behaviour.
- Scapegoating or blaming of the child within the family.
- Frozen watchfulness (particularly pre-school children).
- Low self-esteem; lack of confidence; withdrawn; loner; difficulty relating to others.

Fractures

Are of particular concern when:

- Reasons provided are vague, non-existent, or inconsistent with the injury.
- Associated with old fractures.
- Medical attention is delayed.
- Unexplained.

Scars

Are of concern when there are several, different size, or age, or on different parts of the body.

Sexual Abuse: All genders and ages may abuse or be victims of abuse. Victims may be reluctant to disclose sexual abuse due to guilt, fear, or cultural sensitivities.

Behaviour indicators include:

- Sexualised conduct, or conversation inappropriate to the child's age.
- Inappropriate or excessive masturbation.
- Self-harm (including eating disorders), self-mutilation and suicide attempts.
- Prostitution or indiscriminate choice of sexual partners.
- Anxiousness or unwillingness to remove clothes (usually for PE or Sports).

Physical indicators include:

- Pain or itching of genitals.
- Bloodied underwear.
- Pregnancy where the identity of the father is not disclosed.
- Injuries to the genital or anal area.
- Bruising to buttocks, abdomen and thighs.
- Incidence of sexually transmitted disease/s.
- Semen on vagina, anus, external genitalia, or clothing.

Mental Health

All staff should be aware that mental health concerns can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff should remain alert to indicators such as significant changes in behaviour, persistent anxiety, social withdrawal, sleep difficulties, self-harm, neglect of personal care or expressions of hopelessness. Where there is an immediate risk of harm, emergency services must be contacted without delay and the DSL informed as soon as possible.

Children Questioning Their Gender

Staff should be aware that children who are questioning their gender may experience bullying, discrimination, social isolation, online harm or mental health difficulties. Concerns should be reported to the DSL. Any support provided will prioritise the welfare, safety and educational needs of the child, taking account of relevant legislation and statutory guidance. All decisions will be made with the involvement of parents in the best interests of the student and then formally recorded.

Schools will ensure that arrangements relating to toilets, changing facilities, residential visits and other safeguarding measures are managed in accordance with current statutory guidance and risk assessment processes.

Safeguarding Areas of Concern

All the following concerns should be referred to the DSL without delay when found or suspected:

Child-on-Child Abuse

All allegations of child-on-child abuse will be taken seriously and never dismissed as banter, a joke or part of growing up. Child-on-child abuse is a safeguarding concern for both the victim and the alleged perpetrator, and appropriate support and intervention will be provided to reduce the risk of further harm or escalation.

Staff must also be aware this type of abuse may be taking place even when not reported so remain vigilant to detect signs:

- Bullying, including discriminatory behaviour, racism, faith-targeted abuse and other prejudice-based incidents.
- Committing criminal offences.
- Placing other students at risk.
- Violent behaviour.
- Students forced to use illegal drugs or alcohol.
- Sexual exploitation, sexual abuse, or harassment (indecent exposure; sexual assault; up-skirting; sexting or youth produced sexual imagery).
- Extra-familial harms including domestic abuse or teenage relationship abuse.
- Initiation/hazing type violence and rituals.
- Behaviour influenced by misogyny/misandry, violence against women and girls (VAWG), or harmful online ideologies.

If the incident is a potential criminal offence and there are delays in the investigation, the DSL will consult with the police and other relevant agencies while ensuring appropriate safeguarding and disciplinary actions are taken. The school will seek guidance where needed.

Schools can reduce the incidence of Child-on-Child abuse through:

- Ensuring the curriculum educates students on respectful behaviour, personal boundaries and the principles of consent.
- Challenging derogatory or sexualised language or behaviour. (Includes sexting – see below).
- Being vigilant to issues affecting different genders, such as sexualised or aggressive touching or grabbing of girls, initiation style violence for boys.
- Educating students about appropriate behaviour and consent.
- Ensuring students know they can talk to staff confidentially.
- Enacting effective mitigations such as a no mobile phone policy and internet firewalls.

Sharing Nudes and Semi Nudes

Staff must immediately report to the DSL any incident involving the consensual or non-consensual sharing of nude or semi-nude images or videos. Staff should recognise that such incidents may be indicative of wider safeguarding concerns, including coercion, exploitation, bullying, sexual harassment or abuse.

Staff must not:

- View, print, download, share, save or delete the imagery, or ask someone else to do so. The DSL must be informed when they have been viewed accidentally.

- Ask the student/s involved to disclose information regarding the imagery (DSL responsibility).
- Share information about the incident with other staff, students, or parents.
- Say or do anything to blame or shame the students involved.

You **must** inform the students involved that you need to report the incident to the DSL.

Following a report, the DSL will determine whether:

- There is an immediate risk to a student/s.
- If it is necessary to view the imagery for safeguarding reasons.
- If further information is required.
- If the imagery has been widely shared and if so where.
- Whether images should be deleted from devices or online platforms.
- Gather relevant information to inform a risk assessment e.g age, SEND, vulnerability, power imbalance, coercion, exploitation, mental health and whether the incident forms a wider pattern of behaviour.
- A referral needs to be made to the police or CSC.
- If the is a need to contact another school, college, setting or individual.
- Whether to contact parents/carers of the students involved (in most cases they should be involved).

The DSL must make an immediate referral to police and/or CSC where:

- It involves an adult.
- The student may have been coerced, extorted, blackmailed, groomed, or there are concerns about their capacity to consent.
- Imagery involves sexual acts of students under the age of thirteen or depict sexual acts which are violent or unusual for the student's developmental stage.
- The student is at immediate risk of harm owing to the sharing of the imagery (suicide or self-harm).

The DSL should also immediately refer to CSC and police where they have any other concerns that a child has been harmed or at risk of harm.

Artificial Intelligence (AI)

Generative AI may facilitate abuse through grooming, exploitation, bullying, extortion, creation of deepfake imagery, misinformation, disinformation, conspiracy theories and image-based sexual abuse. Staff should remain professionally curious, and report concerns to the DSL without delay.

Up-Skirting

Is a criminal offence that involves taking a picture under a person's clothing without their knowledge or consent with the intention of viewing genitalia or buttocks for sexual gratification, or to cause humiliation, distress or alarm. All incidences must immediately be reported to the DSL.

CCE

Occurs when an individual or group takes advantage of a power imbalance to coerce, control, manipulate or deceive a child into criminal activity. This may be achieved in exchange for something the victim needs or wants, money, or violence or the threat of violence. Victims may not recognise themselves as being exploited and can appear to be willing participants.

Examples include working in cannabis factories, county lines drug running, forced shoplifting/pickpocketing, threatening other children. It may be conducted online or offline and be a one-off or regular occurrence.

Signs of CCE include:

- Unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Changes in emotional wellbeing.
- Using drugs or alcohol.
- Going missing or regularly coming home late.
- Regular absence from school.

Children Absent from Education

Is when a child is absent from school for prolonged or repeated occasions. This can indicate a range of safeguarding issues and must always be investigated without delay. Schools must immediately inform the LA when a student leaves a school without a new one named or a student is removed from the school roll at a non-standard time. The DOSP will ensure that all appropriate checks have been carried out by the school and LA before a child is taken off school roll.

CSE

Occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. This is often in exchange for something the victim wants, and/or the financial advantage or status of the perpetrator. It may be accompanied by violence or threats of violence. It can be:

- Perpetrated by both genders, children, or adults.
- One-off or repeated.
- Opportunistic or organised.
- Involve contact or no contact.
- Online or offline.

Victims may not recognise themselves as victims and may appear to be willing participants Exploitation can occur even where activity appears consensual, particularly where a child trusts the perpetrator or believes they are in a genuine relationship. CSE may also occur without a child's knowledge or consent, including through the sharing, copying or distribution of images or videos.

Domestic Abuse

Children may experience domestic abuse at home or in their own personal relationships (teenage relationship abuse). Domestic abuse can be psychological; physical; sexual; financial; or emotional and may involve both children and adults. Where police attend a domestic abuse incident witnessed by a child, they will inform the DSL before the child arrives at school the following day, who will then support the child accordingly.

Extremism, Radicalisation, and Terrorism

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others.

- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights.
- Intentionally create a permissive environment for others to achieve extremist goals.

The DSL will refer all incidences to LA CSC and the government Channel programme where appropriate.

If staff believe a child is in immediate danger, may be planning to travel to join an extremist group, or witness something that may be terrorist-related, they can call 999 or the confidential anti-terror hotline (0800 789 321).

The Department for Education also has a dedicated telephone helpline (020 7340 7264), which staff can contact to raise non-emergency concerns about extremism. Alternatively, staff may also email concerns to: counter.extremism@education.gov.uk.

Radicalisation occurs when someone legitimises support for terrorist violence.

Students with low-esteem, or victims of bullying or discrimination are at most risk.

Schools must be alert to potential threats based on an understanding of the local area and advice from the LA and police.

Signs include:

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

Terrorism is an action that:

- Endangers or causes serious violence to person/s.
- Causes serious damage to property.
- Causes major interference or disruption to an electronic system.

Schools have a duty to prevent children from becoming involved with or supporting terrorism and must ensure that all staff have access to training to allow them to identify children susceptible to extremist ideology and radicalisation.

Suitable internet filtering and monitoring is used across trust IT networks to prevent students accessing extreme sites while at school, with guidance provided to enable them to stay safe whilst online at home.

FGM

Is illegal and comprises all procedures involving the partial or total removal or other injury to female genitalia.

Any **teacher** who discovers or suspects FGM ***must immediately report this to the police***. This is a statutory duty, and they may face disciplinary action for failing to do so. This duty does not apply when a student is deemed as being at risk of FGM.

Other staff members discovering or suspecting an act or potential act of FGM must inform the DSL without delay.

FGM may be disclosed by the child, other family member, or friends. But where not, staff should be alert to potential signs which include:

- Difficulty walking, sitting, sitting still for extended periods, standing; looking uncomfortable.
- Spending longer than normal in the bathroom or toilet (May indicate difficulty urinating).
- Frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise.
- Repeated or prolonged absence.
- Increased emotional or psychological needs (withdrawal; depression; behaviour changes).
- Reluctance to undergo medical examination.
- Asking for help but not being explicit about the problem.
- Talking about pain or discomfort between the legs.

Note: Staff must never examine students for evidence of FGM.

FGM risk factors include:

- Family history (main risk factor) and having a mother, sibling or cousin who has undergone FGM.
- FGM practiced in the community or country of origin.
- Family is not engaging with professionals (health, education, other) or already known to social care for safeguarding issues.
- Limited integration of family within UK society.
- Child confiding that she is to have a ‘special procedure’ or attend a special occasion to ‘become a woman.’
- Child talking about a long holiday to a country of origin or another country where FGM is prevalent.
- Parents mention that they or a relative will take the child out of the country for a prolonged period.
- Child talking about FGM in conversation or requesting help because they are aware or suspect they are at risk of FGM.
- Unexpected sudden absence.
- Having sections missing from their Child Health Record ‘Red Book.’
- Attending a travel clinic or equivalent for vaccinations or medication.

Forced Marriage

Is a criminal offence which occurs when one or both parties is coerced or directed into marriage through physical, emotional, or psychological threats.

Staff must be aware and vigilant of the ‘one chance’ rule and need for swift action in such cases, reporting concerns to the DSL without delay.

The DSL must speak to the student in a secure private location and where needed activate local safeguarding procedures. They can also seek advice from the Forced Marriage Unit (020 7008 0151 or fmu@fco.gov.uk)

Note: It is a criminal offence to arrange for a child under 18 to marry, even without coercion. This includes both legal marriages and non-legally binding ceremonies.

Homelessness

Where occurring, the DSL must contact the local housing authority to raise concerns without delay.

'Honour-based' Abuse (HBA)

HBA is committed to protect or defend the honour of the family or community. Examples include FGM, forced marriage, and breast ironing. It may involve a wider family or community network with many perpetrators.

Online Safety

Online threats comprise four main types:

- **Content**: Exposure to illegal, harmful, or inappropriate material such as misinformation, disinformation and conspiracy theories.
- **Contact**: Being subjected to harmful online interactions.
- **Conduct**: Personal online behaviour that increases the likelihood of harm or causes harm.
- **Commerce**: Risks such as online gambling, inappropriate advertising, phishing, or financial scams.

Threats should be countered through online safety training.

Students using the school network or devices to access the internet are protected from inappropriate content through trust filtering and monitoring systems.

Serious Violence

Students may be at risk of, or involved in, serious violence. Indicators can include unexplained injuries, changes in behaviour or peer groups, increased absence, exclusion, or possession of unexplained items. Staff must report concerns, including where a child is carrying, using, threatening to use, or intends to use a weapon, to the DSL without delay. The DSL will assess the risk and implement appropriate safeguarding, support and risk management measures.

Sextortion

Where adults threaten to release nude or semi-nude images unless they pay money or perform other actions requested by the offender. This is a crime which affects all ages and genders, but mainly males aged 14-18.

Offenders often gain the confidence of children by posing as child to gain their confidence and produce images. They may also steal images or digitally manipulate them, including the use of AI.

Section 5: Employment Checks, Administration and Training

All offers of employment are provisional subject to satisfactory recruitment checks.

New staff:

- Identity.
- Enhanced DBS disclosure including barred list information for those engaging in Regulated Activity.
- Prohibition Orders and Barred list checks (if starting work in regulated activity before DBS certificate is available).
- Right to work in the UK.
- Professional qualifications.
- Previous employment (contradictory or incomplete information).
- Social media searches.
- Section 128 checks (senior leadership roles).
- Childcare Disqualification Regulation (2018) and Childcare Act (2006) checks (schools with students under eight years of age).

Additional checks are made for candidates who have lived or worked outside of the UK. These include criminal records checks; and letters of professional standing (teaching roles) from the regulatory authority where the applicant has worked.

Where full checks cannot be made, the school must complete a risk assessment which includes an evaluation of risk, control measures, and any advice or guidance received. The assessment is retained in personnel files.

Checks must be made on **existing staff** moving from unregulated to regulated activity.

DBS Referrals

A DBS referral will be made when someone has:

- Received a caution or conviction for a relevant offence, or there is reason to believe they have committed a listed relevant offence.
- Met the 'harms test' (may harm or put a child at risk of harm).
- Been removed from working in regulated activity, or would have been removed, if they had not left that employment.
- There is a reasonable belief they have engaged in relevant conduct.

References

References will be obtained before interview and verified directly with the referee. They must be from the current or most recent employer, completed by a senior staff member, and confirmed by the Headteacher if school based. We will also seek a reference from the last employer where the candidate worked with children. Any discrepancies will be addressed before an appointment is confirmed.

Agency Staff

Schools must obtain written confirmation from agencies that they have carried out necessary pre-employment checks. Identity checks should then be made of the person subsequently presenting themselves for work, ensuring it is the same person for whom checks have been made.

Contractors

All contractors must have satisfactory enhanced DBS and barred list checks to work unsupervised in a regulated environment. Schools must also check the identity of all contractors on arrival.

Checks must be conducted on self-employed contractors (music teachers, sports coaches, etc) to ensure they are not disqualified. When checks are not possible, the school must complete and retain a risk assessment, and records of any control measures or advice received.

Trainee Teachers

The trust undertakes all pre-employment checks for teachers trained directly by them. Schools must ensure they have written confirmation from external training providers that statutory pre-employment checks have been carried out and are suitable to work with children. This includes checks under Childcare Disqualification Regulations 2018 and Childcare Act 2006 for those working in primary and early years.

Volunteers

The trust makes enhanced DBS and barred list checks for all volunteers engaged in regulated activities. Volunteers must not begin work in EYFS provision until an enhanced DBS certificate, including barred list information where required, has been received and reviewed. Unchecked volunteers must never be allowed to work unsupervised in a regulated activity.

A risk assessment should be conducted to determine whether enhanced checks are necessary for volunteers not working in regulated activities.

Additional checks are made in primary provision to ensure that volunteers are not disqualified under the Childcare Disqualification Regulations (2018) and Childcare Act (2006). Where these checks cannot be made, schools must retain a record of their risk assessment including evaluation of risks, control measures, and advice received.

AEP

Where a student is placed in Alternative Provision, the school will obtain written confirmation that appropriate safeguarding checks have been completed and that suitable risk assessments are in place. The school retains overall responsibility for the student's safeguarding and welfare and will maintain appropriate oversight, communication and monitoring arrangements, reviewing placements at least half-termly to assure attendance, safeguarding and suitability.

Record Keeping

All pre-employment checks are recorded in the SCR and held (where appropriate) within individual CPOMS Staffsafe records.

Safer Recruitment

At least one person involved in staff recruitment must have undertaken Safer Recruitment training.

Trustees and Governors

All trustees, members and governors undertake identity, section 128 management, and enhanced DBS checks. The COT will have their DBS check countersigned by the secretary of state.

Training

In accordance with statutory guidance, all staff undertake Safeguarding, Child Protection and Prevent training during induction to the trust and at the start of each academic year. This is supplemented by updates throughout the year. Staff are also issued this policy and any updates so that they may familiarise with best practice.

DSL's/DDSL's undertake child protection and safeguarding training at least every two years, whilst updating their knowledge and skills on an ongoing basis through e-bulletins, meetings, or wider training. They also undertake Prevent awareness training every two years.

Trustees receive safeguarding and child protection training at induction to ensure they have the knowledge to understand their responsibilities and perform their duties.

Visitors

All visitors must sign in at reception and wear a visitors' badge or lanyard throughout the duration of their stay. If the visitor is not known, the school must check their identity and reason for visiting before allowing them entry into any area where they may be in contact with children.

Those visiting on a professional basis such as school nurses or educational psychologists will be asked to produce photo ID, and a DBS certificate except where the school has received prior written confirmation that an enhanced DBS check with barred list information has been undertaken.

All other visitors must always be accompanied by a member of staff throughout their stay.

Schools should also make reasonable checks to ensure that visitors working with, or meeting students do not have extreme views, or contravene school/trust rules or legislation.

Record Keeping

All safeguarding concerns, discussions, decisions and reasons must be formally recorded. Confidential information and records will be securely stored and only available to relevant personnel.

Student safeguarding records will be retained for an appropriate period after they have left school. When a student with a record of safeguarding concerns moves to another school, staff should proactively share safeguarding information where necessary to protect children and should not allow uncertainty about data protection to prevent appropriate safeguarding action. The DSL will ensure that their child protection file is forwarded promptly and securely within five school days, separate from their main student file. Where concerns are current, significant or complex, the DSL will liaise with the DSL of the receiving school to facilitate a safe transition.

Confidentiality

All child protection records are confidential except for when sharing is essential to protect and promote the welfare of students, as encoded in statutory data protection guidance. Staff should seek advice from the DSL or Trust Data Protection Officer should any questions arise.

Mobile Phones and Cameras

Schools operate in accordance with DfE guidance on mobile phone-free educational environments.

The use of personal devices in all schools must be consistent with safeguarding responsibilities and support the prevention of online harm, exploitation and child-on-child abuse.
Staff, trainee teachers, volunteers, contractors, students and visitors must not take photographs, videos or audio recordings using personal devices unless authorised and appropriate permissions have been obtained.

Contextual Safeguarding

DSLs in all schools must be aware of the major local safeguarding threats facing their students, working within school, families, and external agencies to counter these.

Filtering and Monitoring

The Trust has appropriate filtering and monitoring systems in place to safeguard students when accessing Trust networks, devices and online services. The DOSP and COO have strategic oversight of filtering and monitoring arrangements across the Trust and work alongside school DSLs and Trust IT Services to ensure systems are effective, concerns are identified, recorded and acted upon promptly, and emerging risks are appropriately managed. Staff understand their responsibilities for reporting online safety concerns. Filtering and monitoring arrangements are reviewed termly to assess their effectiveness and proportionality to safeguarding risks, with assurance provided to Trustees through regular safeguarding reporting.

Appendix 1: DSL School Contact Details

Carlton Bolling	
Designated Safeguarding Lead	Mr A. Ingham Safeguarding@cb.catrust.uk
Deputy Designated Safeguarding Staff	Miss A. Akhtar Miss B. North Miss K. Topley Mr N. Charlton Mr R. Mezals Mr I. Laher Ms A. Chomanicz Mr J. Bennett

Carlton Keighley	
Designated Safeguarding Lead	Mrs H Petrik-Davies safeguarding@ck.catrust.uk
Deputy Designated Safeguarding Staff	Miss Z Kirkpatrick Miss N. North Mr M. Beesley Ms M. Blackmore Mr M. Turvey Mrs C. Gudgeon Mrs A Leggett

Carlton Mills	
Designated Safeguarding Lead	Mr R. Seedher rir@cm.catrust.uk
Deputy Designated Safeguarding Staff	Mr J. Dunn Ms R. Naz

Marshfield	
Designated Safeguarding Lead	Mrs Z Kearns safeguarding@ma.catrust.uk
Deputy Designated Safeguarding Staff	Mr S. Ali Ms A. Price Mr A. Perkins Mrs O. Shazad Ms S. Sugden

Thorpe Primary	
Designated Safeguarding Lead	Mr P. Mennell safeguarding@th.catrust.uk
Deputy Designated Safeguarding Staff	Mrs M. Fletcher Ms V. Webb Mrs O. Bottomley

High Park Special School	
Designated Safeguarding Lead	Sarah Tollemache safeguarding@hp.catrust.uk
Deputy Designated Safeguarding Staff	Bridie Dorning Nicole Priestley

Beechcliffe – Keighley Site	
Designated Safeguarding Lead	Laura Bownass safeguarding@bk.catrust.uk
Deputy Designated Safeguarding Staff	Michelle Nichols Aimee Traill Rob Slater Adriana Cracknell-Witney Lesley Fahy Ashleigh Nicoles

Beechcliffe – Thackley Site	
Designated Safeguarding Lead	Will Pacey safeguarding@bt.catrust.uk
Deputy Designated Safeguarding Staff	Michelle O'Neill Caroline Staveley Matthew Hawthorn

Oulton Academy	
Designated Safeguarding Lead	Ben Barnes safeguarding@oa.catrust.uk
Deputy Designated Safeguarding Staff	Debbie Arnold Claire Sykes

Bradford Local Authority Contact List

Children's Social Care Practitioner's Contact / Referral	01274 433999

Children's Social Care Initial Contact Point	01274 435600
Children's Social Care Out of Hours Emergency Duty Team	01274 431010
Bradford Child Sexual Exploitation Hub	01274 435049 Child.exploitation@bradford.gov.uk
Bradford Education Safeguarding Team	01274 437043 Edsafeteam@bradford.gov.uk
Local Authority Designated Officer (LADO)	01274 435600 LADO@bradford.gov.uk
Bradford CME Team	01274 438877 CME@bradford.gov.uk
Bradford Access Team	01274 439393 Education.Access@bradford.gov.uk
Bradford Council's Early Help Gateway	01274 435600
Bradford Prevent Co-ordinator	01274 376215 Danielle.king@bradford.gov.uk
The School Nursing Team	01274 221203

Leeds Local Authority Contact List

CSWS Duty and Advice	0113 376 0336
CSWS Emergency Duty Team (out of hours)	0113 535 0600 childrensEDT@leeds.gov.uk
Education Safeguarding Team	0113 378 9685 estconsultation@leeds.gov.uk
Local Authority Designated Officer	0113 378 9687 LADO@leeds.gov.uk
Cluster Targeted Services Lead	Keith.lander@leeds.gov.uk
PREVENT Team	0113 535 0810 prevent@leeds.gov.uk
Children Missing Education CME	cme@leeds.gov.uk
School Nursing Service	0113 843 5683 Chat Health: 07520 619 750
NHS Sexual Health Service	0113 392 0333 Lcht.ishadvice@nhs.net
Forward Leeds Drugs and Alcohol Service	0113 887 27477