

Schools in the Learners' Trust

Child Protection and Safeguarding Policy (including safer recruitment, allegations against staff and low-level concerns)

September 2026

Date of Policy approval: September 2026

Date for Review: September 2027

Policy Consultation & Review

This policy is available on our school website and is available on request from the school office.

The policy is provided to all staff (including temporary staff, student teachers and volunteers) at induction alongside our Staff Code of Conduct.

In addition, all members of staff are provided with Part 1 of the statutory DfE Guidance [Keeping children safe in education - GOV.UK](#).

All staff read and understand at least Part 1 of the Department for Education's statutory guidance [Keeping children safe in education - GOV.UK](#) (KCSIE) in full and review this guidance at least once annually. All staff will sign a declaration at the beginning of each academic year to say that have received, read and understood the guidance.

This policy will be reviewed in full by each school and the Learners' Trust.

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Purpose and Aims

Schools in the Learners' Trust aim 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.

Legal framework

This safeguarding policy is written in compliance with locally agreed multi-agency procedures that have been put in place by the three statutory safeguarding partners:

- The local authority (LA)
- Integrated Care Boards (previously known as clinical commissioning groups)
- The chief officer of police for South Yorkshire.

Legislation

- Section 175 of the Education Act 2002 which places a duty on school and local authorities to safeguard and promote the welfare of children
- The Children Act 1989 and (2004 amendment)
- Designated Teacher for looked after and previously looked after children 2018
- Early Years Foundation Stage (EYFS) statutory framework 2026
- The Safeguarding Vulnerable Groups Act 2006
- The Equality Act 2010
- Data Protection Act/GDPR Regulations 2018
- The Children and Families Act 2014
- The Sexual Offences Act 2003
- Voyeurism Offence Act 2019
- Female Genital Mutilation Act 2003 and statutory guidance on FGM
- Counter Terrorism and Security Act 2015 and statutory guidance on the Prevent duty
- Domestic Abuse Act 2021
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amended) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which sets out who is disqualified from working with children
- Sexual Offences Act 2003
- Children's Wellbeing and Schools Act 2026

Statutory guidance

- DfE Working together to safeguard children
- DfE (2026) Keeping Children Safe in Education
- DfE (2026) revised Relationships Education, Relationships and Sex Education (RSE) and Health Education
- Designated Teacher for looked after and previously looked after children 2018
- DfE (2016) Disqualification under the Childcare Act 2006'
- Early Years Foundation Stage (EYFS) statutory framework 2026
- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage
- The Human Rights Act 1988
- The Equality Act 2020.

Non-statutory guidance

- DfE (2025) What to do if you are worried a child is being abused'
- DfE (2018) Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2016) Children missing education'
- DfE (2018) Mental Health and Behavior in Schools'
- DfE (2019) Teaching Online Safety in ss'
- The Equality Act 2020
- DfE (2025) Filtering and Monitoring standards for schools and colleges'
- DfE 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE 'Meeting digital and technology standards in schools and colleges'
- DfE 'Filtering and monitoring standards for schools and colleges'
- DfE 'Restrictive interventions, including the use of reasonable force in schools'.

Our ethos

Safeguarding and promoting the welfare of children - defined for the purposes of this guidance as: **'Working Together to Safeguard Children (2026)'**

(Definition of Children: *A child is defined as anyone who has not yet reached their 18th birthday. 'Children therefore means 'babies, children and young people.'*)

The purpose of this safeguarding policy is to ensure every child who is a registered pupil in our schools is safe and protected from harm, and we expect everyone who works in our schools to share this commitment. This means we will work to take all welfare concerns seriously and always act in the best interest of the child to:

- Provide help and support to meet the needs of children as soon as problems emerge
- Protect children from maltreatment whether that is within or outside the home, including online
- Prevent 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.

This policy will give clear direction to staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children in our schools.

We also assess the risks and issues in the wider community, known as contextual safeguarding (assessment) of risk outside the home, HOTH) when considering the wellbeing and safety of our pupils.

All staff will have an awareness of safeguarding issues that can put children at risk of harm, including Harm outside The Home (HOTH).

Reporting and responding to concerns about pupils

Schools in the Learners' Trust maintain an attitude of "it could happen here" where safeguarding is concerned. Staff should always act in the best interests of a child when they are concerned about their welfare. Our staff will recognise that data protection legislation **does not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Where there is any doubt about sharing information, staff will seek advice from the DSL or DDSL(s). Concerns about sharing information **must not** prevent the timely sharing of information where this is necessary to safeguard and promote the welfare of children.

If a member of staff has any concern about a pupil's welfare, or a pupil reports a safeguarding concern about themselves or another pupil, the member of staff will act immediately by reporting the concern to their school's DSL or DDSL(s).

Staff will not assume that a colleague or another professional will act or share information that may be critical to keeping a pupil safe. Staff will recognise that early information sharing is essential to the effective identification, assessment, and provision of appropriate support.

Where the school's DSL is unavailable, staff will report the concern to a DDSL(s). In exceptional circumstances, where neither the DSL nor DDSL(s) are immediately available, this will not delay appropriate action being taken. Staff will seek advice from a member of the SLT and/or children's social care, as appropriate. Any action taken in these circumstances will be shared with the DSL or DDSL(s) as soon as possible. Staff can make direct contact with the Safeguarding Team via the confidential safeguarding email inbox.

Determining the appropriate response

Following a report, the DSL or DDSL(s) will consider the information provided, the pupil's level of need, any known history and the Rotherham Safeguarding Children Partnership (RSCP) Multi-Agency Threshold Guidance & Descriptors before determining the most appropriate course of action.

This may include:

- Providing or coordinating appropriate support within the school through pastoral or wellbeing processes, including considering, where it is safe and appropriate to do so, whether parents should be informed to support the pupil's wellbeing.
- Undertaking or contributing to an early help or family help assessment of need.
- Making a referral to Children's Social Care via contacting Rotherham MASH directly on 01709 336080, or other statutory services where a pupil may be in need, is suffering, or is likely to suffer significant harm.

Where a community-based early help or family help assessment is undertaken, the DSL may possibly coordinate the school's involvement with partner agencies. Staff will contribute to assessments, planning, and review meetings as required. Schools will keep all safeguarding cases under regular review and will request additional intervention or make further referrals where a pupil's circumstances do not improve or where risks increase.

Referrals and multi-agency working

Where a pupil is suffering, or is likely to suffer, significant harm, or is in immediate danger, a referral will be made immediately to Rotherham Children's Social Care and/or the police, as appropriate. Where a criminal offence is suspected, including incidents of sexual violence, the police will be informed without delay.

Our s will follow the reporting and referral process set out in KCSIE and the procedures of the Rotherham Safeguarding Children Partnership.

The DSL will provide advice and support to staff as required. Information will be shared with external agencies in accordance with data protection legislation, information sharing guidance and the school's confidentiality and records management procedures. Where Children's Social Care decides to undertake a statutory assessment, the DSL or DDSL(s) will work proactively with partner agencies and relevant staff to support the assessment process.

If concerns remain following a referral or the pupil's circumstances do not improve, the DSL will escalate concerns or seek reconsideration in accordance with local safeguarding partnership procedures.

The DSL will maintain effective working relationships with Children's Social Care, the Police, and other relevant agencies to promote pupils' welfare while ensuring that the actions of the school do not compromise any ongoing investigation. Schools will not wait for the outcome of a statutory assessment or criminal investigation before taking appropriate action to safeguard and support a pupil. Where statutory intervention is not required, appropriate support will continue to be considered through early help, family help, pastoral support or other suitable interventions.

Supporting pupils and recording concerns

Where safeguarding concerns arise, our schools will ensure that the wishes and feelings of the pupil are considered in decisions affecting them, in accordance with their age and understanding. Pupils will be given opportunities to express their views and will be listened to, taken seriously, and supported. Discussions with parents will take place where appropriate and when doing so will not place the pupil or others at increased risk of harm. The schools will work in partnership with parents and relevant agencies wherever this is in the pupil's best interests. All safeguarding concerns, discussions, decisions, and the reasons for those decisions will be recorded promptly by the DSL or DDSL(s) and any relevant staff. These will be maintained securely in accordance with the school's management procedures. CPOMS records and case notes will be transferred securely when a pupil moves to another education setting, in line with statutory guidance.

The key aims of our policy are prevention, protection, and support.

Every child's welfare is of paramount importance. Our schools will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our schools will be able to talk freely to any member of staff if they are worried or concerned about something.

Every child will have access to a trusted adult.

Everyone who comes into contact with children and their families has a responsibility in safeguarding. It is important for children to receive the **'right help at the right time'** to address risks and prevent issues escalating. All staff will maintain an attitude of **'it could happen here'** where safeguarding is concerned. Safeguarding and child protection is everyone's responsibility. Our policy and procedures also apply to extended school activities and off-site activities.

All staff will, via the schools regular and scheduled training and induction process, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child not to share information appropriately where they are at risk of harm, and we will not keep secrets. We will not promise confidentiality. Every child will know what the adult will have to do with any information they have chosen to share or disclose.

Opportunities to teach safeguarding

Throughout our curriculum we will provide activities and opportunities for children to develop the skills and knowledge they need to identify risks and stay safe. This will also be extended to include material that will encourage our children to develop essential life skills. Our schools teach about safeguarding, including online safety and healthy relationships and recognises that effective education is tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with special educational needs or disabilities.

The safeguarding curriculum is considered as part of providing a broad and balanced curriculum, including covering relevant issues for schools through Relationships Education (for all primary pupils)

and Relationships and Sex Education (for all secondary pupils) and Health Education. In teaching these subjects we commit to ensuring that we comply with statutory guidance.

We recognise that school plays a crucial role in preventative education, in the context of a whole school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. We have a clear set of values and standards, these are upheld and demonstrated throughout all aspects of school life. They are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of effective PSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Where we invite external organisations and / or visitors to enrich our safeguarding curriculum, we ensure that we review the educational value and age appropriateness of what they will deliver.

Our programme tackles safeguarding issues (at an age-appropriate stage) in line with KCSIE 2026 and the latest DfE guidance on Relationships, Sex, and Health Education.

Understanding the views of children

Schools in the Learners' Trust and their staff understand how important it is that children feel heard and understood, and that the child is always placed at the centre of our thinking and actions. We will encourage an ethos of listening to children and taking account of their wishes and feelings.

A child-centred and listening culture throughout our schools will be achieved through training and information shared with the full staff body. To ensure staff have an appreciation of the difficulties that some children may have in approaching staff about their circumstances and worries, a comprehensive approach to training will be embedded. Staff are aware of how to build trustful and respectful relationships with children which enable effective communication.

Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carers has expressed an intention to remove them from school to be home educated.

Supporting Looked After Children, Previously Looked After Children, Children with a Social Worker, Care Leavers and Children in Kinship Care

We will ensure that staff have the skills, knowledge and understanding to keep looked after children safe and they understand that the most common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation. We will ensure that staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

We will have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead will have details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

Furthermore, we commit to:

- Ensuring that staff are aware that a previously looked after child potentially remains vulnerable and have the skills, knowledge and understanding to keep previously looked after children safe.
- Sharing information swiftly with social workers, the virtual school, care leavers personal advisors and other key partners.
- Recognising that children and young people with a social worker, in care, previously in care and Kinship are vulnerable to educational disadvantage.
- Working collaboratively across the Designated Teacher, Designated Safeguarding Lead and Rotherham Virtual School network to ensure effective educational and safeguarding support for vulnerable children and young people within the Virtual School cohort.

We recognise that when a child has a social worker, it is an indicator that the child has vulnerabilities or may be at risk of harm requiring additional support and services. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We will take these needs into account when making plans to support pupils who have a social worker or, are receiving Family Help support.

For children with a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support.
- Completion of the Safeguarding in Education Risk Assessment (SERA) within the Trade Rotherham process when considering exclusion and/or permanent exclusion.

Virtual School Heads

Virtual Heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker. They should identify and engage with key professionals, e.g. DSLs, special educational needs coordinators (SENCOs), social workers, mental health leads and others. This Virtual Headteacher role has recently been expanded to incorporate children who are in kinship care.

The Designated Teacher (DT)

In line with Sections 4-6 of the Children and Social Work Act 2017, the Designated Teacher is responsible for:

- Promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales.
- Ensuring that they have the appropriate training and the relevant qualifications and experience.
- Working with the **Virtual School Head**, to discuss how funding can be best used to support the progress of looked-after children in the school to meet the needs identified in the child's personal education plan and to promote the educational achievement of previously looked after children.

The Mental Health Lead

The Mental Health Lead is responsible for creating a whole-school approach to supporting mental health and wellbeing by:

- Developing a whole-school approach to support mental wellbeing.
- Promoting good mental wellbeing and preventing the onset of mental illness for pupils and staff.
- Ensuring clear processes to report mental health concerns.
- Ensuring clear processes for managing mental health concerns.
- Delivering appropriate training.
- Liaising with the DSL where a mental health problem could indicate that a pupil has suffered or is at risk of suffering abuse, neglect, or exploitation. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide.
- Observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one.
- Ensuring early targeted support is provided.
- Liaising with/referral to specialist services where needed.

First Day Calling Procedures

It is recommended that schools have a robust 'first day calling' procedure for when a child has not arrived at school within the expected time frame. At least **two** emergency contact details will be held for each pupil where possible, however, following learning from a serious case review, DfE recommendation are that schools hold four emergency contact numbers for all pupils. It is good practice to update the contact details annually.

It is recommended that clear time scales are in place to ascertain a reason for non-attendance, this should include an escalation of action to be taken, including that of a home visit where appropriate. It is recommended that a designated staff member is appointed to follow the 'first day calling' procedures.

Expectations are that schools are aware of the reason for absence of the child before the start of the afternoon session. If this cannot be ascertained, schools must consider whether a request to the police for a safe and well check is necessary.

Home Visits undertaken by school staff

Many schools, as part of their safeguarding protocol carry out home visits, welfare checks and safe and well calls to pupil's home addresses. Typically, these situations may be considered in situations where:

- A pupil is absent from school without a valid reason
- The school cannot contact the parent or carer, or
- The school receives a response that raises a safeguarding concern.

On some occasions the schools may be required to carry out unannounced home visits due to the context and/or circumstance. It is important to note however the home visits are not a mandatory requirement within DfE's statutory guidance or advice.

If home visits are being considered for staff, then the school should consider the following:

- A clear home visits policy must be in place
- A comprehensive risk assessment must be completed
- Staff must receive adequate training.
-

No staff member should be compelled to undertake a visit they feel is unsafe.

What is Child Abuse and Neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. Abuse may fall into several categories:

- **Child protection:** Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online. Effective safeguarding is anti-discriminatory and anti-racist. Practitioners should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability, which can impact children and families' lives.
- **Abuse:** A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting or harm, by failing to act to prevent harm. Harm can include ill-treatment that is not physical as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.
- **Physical Abuse** – A form of abuse which 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** – The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as

well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. 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 from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse:** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.
- **Neglect:** 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, for example, because 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Victim:** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- **Alleged perpetrator(s) and perpetrators(s)** are widely used and recognised terms. However, we will think carefully about the terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Specific safeguarding issues are:

Mental Health

School staff are aware that mental health problems can, in some cases, be an indicator that a child has or is at risk of suffering abuse, neglect, or exploitation. Staff are well placed in their daily contact with children to be able to identify behaviour that suggests they may be developing or have a mental health problem.

Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern for a child that is also a safeguarding concern, they must take immediate action by following the child protection procedures and speaking to the DSL. All concerns must be logged on the school's recording system, along with the actions taken.

Schools in the Learners' Trust use CPOMS to records any concerns they may have about a child and any follow up actions are also recorded.

Criminal Exploitation of Children (CCE) Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Contextual Safeguarding – Harm Outside the Home (HOTH)

School staff, particularly the DSL and their deputy(s), are aware that the children in our schools may face additional extra-familial risks outside of the school context. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including:

- exploitation by criminal gangs and organised crime groups such as county lines
- trafficking
- online abuse
- teenage relationship abuse
- sexual exploitation and
- the influences of extremism leading to radicalisation

Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

Schools in the Learners' Trust consider the local context when planning the curriculum in order to incorporate issues / concerns in the local community. Raising awareness and supporting the children to keep themselves safe is done via the PSHE curriculum, assemblies and visiting speakers.

Rotherham Children's Social Care have created a Rotherham Partnership Child Exploitation (CE) pathway for multiagency partners. The pathway has been designed to help professionals who work with children and their families to make decisions regarding referrals where child exploitation (CE) is suspected. The tool contained in the pathway indicator is designed to be a guide which can support professionals to the most appropriate course of action where concerns related to child exploitation are present.

The framework is designed to help different agencies to work to the same criteria when considering possible CE. The pathway indicator can be used in two ways, either as a tick box screening tool which can be used to enable practitioners, including school staff understand an individual's risk of exploitation, or as supplementary guidance which allows practitioners and school staff to embed the learning into their existing assessments and plans.

The pathway indicator utilises a tiered framework for identifying potential child exploitation; and risk factors that are well established indicators of exploitation are in the red section, probable risk factors and indicators in the amber section, and additional factors in the yellow section. Similarly, there are also distinctions within risk factors, such as 'confirmed/suspected' and 'currently/previously'. While they are important distinctions, they are both significant in deciding whether an individual child or young person is at risk.

Partner agencies, including schools are encouraged to report information to the police if they believe that the information may relate to potential issues concerning sexual exploitation of children or adults. The information will be assessed as to whether action needs to be taken to safeguard others, and whether it provides valuable information to the wider 'jigsaw'. Concerns and suspicions shared by schools will always be taken seriously. When providing information, always give as much detail as possible, including where the information came from, how recent or how old it is, names, dates of births, addresses, vehicle details etc: Who? What? Where? When? Why? How?

The guidance concludes with a tiered tool and a flow chart to support you in using this, alongside useful telephone numbers [exploitation-pathway.pdf](#)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more different urban or rural areas, using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children groomed and exploited to move [and store] drugs and money from urban areas to suburban areas, rural areas, and market and seaside towns. Gangs use coercion, intimidation, violence, sexual violence, and weapons to ensure the compliance of their victims.

Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL. The DSL will consider referral to MASH and the National Referral Mechanism on a case-by-case basis.

Indicators that a pupil may be victims of criminal exploitation include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling, or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons

- Sudden decline in school results and a decline in attendance
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern.

Serious violence and violent crime

All staff, through training, will be made aware of the indicators which may signal that a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions.

If any staff member suspects that a child may be vulnerable to, or involved in, serious violent crime they must report it immediately to the DSL.

Child Sexual Exploitation (CSE) and Trafficking

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can occur using technology.

CSE can occur in all communities and amongst all social and ethnic groups and can affect girls and boys. Children as young as 8 years have been identified, particularly in relation to online concerns. CSE is a complex form of abuse and it can be difficult for those working with children to identify and assess however, all those working in our schools are made aware of the potential indicators of grooming and exploitation and how to refer concerns on appropriately.

There are two different types of **trafficking** of children and young people for the purposes of sexual exploitation. Firstly, there is trafficking from abroad into the United Kingdom. The second category is internal trafficking, where children and young people are moved from one place to another in the UK for the purposes of sexual exploitation. This may be from one street to a neighbouring street, from one area of a town or city to another area, or across county borders. It is not the distance that is relevant in the definition of internal trafficking, but the movement of a child or young person for the purpose of sexual exploitation.

Child-on-Child Abuse

Child-on-child abuse occurs when a young person is exploited, bullied and/or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18.

Child-on-child abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and

crucially it does not capture the fact that the behaviour in question is harmful to the child perpetrator as well as the victim. Child-on-child abuse may not just occur between peers, but also family members, siblings etc. Key areas where child on child abuse occurs are:

- Bullying, including online/cyber bullying and prejudice-based bullying
- Racist, religious, disability and homophobic or transphobic abuse
- Gender based violence/violence against girls and young women
- Teenage relationship abuse
- Issues relating to gang activity and youth violence
- Sexual harassment and sexual violence, including sexting and harmful sexual behaviour
- Upskirting - taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks (carries a 2-year sentence under the Voyeurism (Offences) Act 2019).

Most cases of pupils hurting each other will be dealt with under our school's Behaviour Policy but the 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 pupils in the school at risk
- violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old. Schools are aware of the common risk factors for FGM which include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-s to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

FGM is addressed as part of the procedures around '**Honour Based Abuse (HBA)**' which is defined as "Crimes which have been committed to protect and defend the honour of the family and/or the community, including FGM, Forced Marriage and practices such as Breast Ironing".

Our schools have due regard to the **mandatory reporting duty (FGM Act 2003)**, which places a **statutory duty** on all teaching staff (along with social workers and healthcare professionals) to personally report to the police where they discover that FGM appears to have been carried out on a girl under 18 years.

Our staff will be vigilant and will report promptly any FGM or other honour-based abuse concerns to the DSL. If a member of staff has reason to believe FGM has been carried out on a girl under 18 years and this occurs out of school, then they must exercise their statutory duty and report this to the police personally.

Preventing Radicalisation and Extremism (Prevent Duty)

Schools in the Learners' Trust have due regard to the **Prevent Duty** Guidance 2023, under Section 26 of the Counter Terrorism and Security Act 2015, which aims to prevent children and young people from being drawn into extremism and terrorism.

In our schools we use age-appropriate curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Schools engage with parents and families as we are in a key position to spot signs of radicalisation and we will assist and advise those families who do raise concerns and point them in the direction of support mechanisms i.e., the Local Authority, Police and/or the **Channel Programme**. We will provide a link, via the school's website, to the Local Safeguarding Children Partnership website which provides information on radicalisation for children and young people, their parents/carers and professionals:

As with other safeguarding risks, staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the **Channel** programme.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. Referrals to the Channel Panel in Rotherham are via the LA Children's Social Care Multi-Agency Safeguarding Hub (MASH) on 01709 336080.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil.

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

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

Children witnessing domestic abuse

Witnessing domestic abuse is really distressing and scary for a child and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. Children can experience domestic abuse or violence in lots of different ways. They might:

- see the abuse
- hear the abuse from another room
- see a parent's injuries or distress afterwards
- be hurt by being nearby or trying to stop the abuse.

The Domestic Abuse Act 2021 recognises that children are victims of domestic abuse in their own right.

The definition of domestic abuse applies to children if they see or hear, or experience the effects of, the abuse and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Operation Encompass

Schools support an initiative called '**Operation Encompass**' a partnership between South Yorkshire Police and Education, supported by each Local Safeguarding Children Partnership.

Operation Encompass has been designed to provide support for any child in school who may be affected by a domestic abuse incident where the police have attended.

A key safeguarding member of staff in school will be informed when a domestic abuse incident has been recorded within the previous 24 hours or over the weekend. This will enable staff in our schools to monitor children possibly affected and provide appropriate support to promote their welfare. This will remain confidential; no information about specific incidents is shared with school. The school will, however, be able to make provision for possible difficulties experienced by children who have been involved in, affected by, or witnessed a domestic abuse incident.

We are keen to offer the best support possible for our children and young people and we believe that Operation Encompass will enhance safeguarding within our schools. This will be extremely beneficial for all those involved.

Online Safety

Schools in the Learners' Trust have an effective whole school policy and approach to online safety which includes ensuring an understanding of:

- Roles and responsibilities in relation to filtering and monitoring, school devices and school networks including the use of AI.
- The 4 areas of risk (4Cs) as the basis of the school's online safety policy which are:
 - **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
 - **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
 - **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
 - **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.
- School Champions and leaders to support schools and colleges to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing).

- Educating pupils, students, and staff in their use of technology in line with the taught safeguarding curriculum (outlined above) and ensuring that staff understand the four areas of risk for online safety outlined in KCSIE.
- Mechanisms to identify, intervene in, and escalate any concerns where appropriate.

We are committed to considering how online safety is reflected in:

- all relevant policies
- the planning of the curriculum
- staff training
- the roles and responsibilities of the DSL and all staff
- Information and guidance provided to parents.

Our schools will always adhere to the Online Safety Policy.

To address this our schools aim to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and school champions
- Protect and educate the whole school community in its safe use of technology, including mobile technology
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

In our schools, we understand the responsibility to educate our pupils about all online safety issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom.

We have a separate Online Safety Policy which is available on request.

The person responsible for the annual review of filtering and monitoring is the head teacher and the Trust's IT.

Mobile Phones and Smart Technology

Schools in the Learners' Trust recognise the importance of having clear policies on mobile phones, devices and smart technology (cameras and smart devices, including SMART watches, META glasses and use of Airtags / trackers) to safeguard our pupils.

In line with statutory guidance our schools are a mobile phone-free environments by default; anything other than this is by exception only.

Remote Education

Where children are being asked to learn online at home, our schools will use the information provided by DfE, NSPCC and PSHE Association to do so safely; and our regular communications with parents and carers will be used to reinforce the importance of children being safe online and we will help them

understand what systems schools are using to filter and monitor online use. We will ensure that parents and carers are aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

Online Information Security, Filters, Access and Monitoring

Schools in the Learners' Trust have appropriate filters in place to reasonably limit exposure to risks from the use of school's technology. In applying appropriate controls, we consider the number of and age range of our children, those who are potentially at greater risk of harm and how often children are accessing technology. Filtering is monitored routinely to ensure that it is working in line with the factors outlined above. This is recorded and shared with the school's Trust Partner and Trustees. The appropriateness of any filters and monitoring systems will be informed in part, by the risk assessment required by the Prevent Duty.

Staff are trained to understand their role in ensuring that they remain vigilant to the risks associated with accessing technology within school and understand their role in monitoring pupil use as part of their role as much as is reasonably possible.

The governing body commits to ensuring that appropriate filters and monitoring systems are in place, without "over blocking" to avoid unreasonable restrictions as to what children can access to use technology effectively to support their learning.

The governing body have reviewed the [Department of Education filtering and monitoring standards](#) and [Cyber Security standards for Schools and Colleges](#) and ensured that what needs to be done to meet this standard has been implemented.

The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

Schools in the Learners' Trust apply the appropriate level of security protection and procedures in place, in order to safeguard our systems, staff and children. These arrangements will be reviewed periodically (at least once every academic year) ensuring the filtering is working appropriately, and a record of these checks is held. We will also keep up to date with evolving cyber-crime technologies. Our schools will carry out an annual review by the SLT member who is responsible for filtering and monitoring, with the support of the school's designated lead and Trust IT support of our approach to online safety, including the use of AI and filtering and monitoring. This will include checks that the filter is working appropriately on all Internet connected devices in all locations and records held. This will consider and reflect the risks our children face.

Artificial Intelligence (AI)

Generative AI is one type of AI. It refers to technology that can be used to create new content based on large volumes of data that models have been trained on a variety of sources.

ChatGPT, Microsoft Copilot and Google Gemini are generative AI tools, built on large language models (LLMs). LLMs are a category of foundation models trained on large amounts of data, enabling them to understand and generate human-like content.

Schools in the Learners' Trust recognise that AI has many uses, including enhancing teaching and learning and in helping to protect and safeguard pupils. However, AI also has the potential to facilitate

abuse (e.g. through bullying and grooming), allowing for false accusations to be made against other pupils or staff (e.g. through the use of 'deepfakes') and/or expose pupils to harmful content. We will respond to any misuse of AI in line with this policy and our Anti-Bullying, online safety and behaviour policies.

Safety is our main priority when deciding whether to use generative AI in our setting. Any use of generative AI by staff and pupils will be carefully considered and assessed, evaluating the benefits and risks of use in its education setting. Our schools use the appropriate DfE guidance and policy for AI: [Generative artificial intelligence \(AI\) in education](#), [Using AI in education settings:supportmaterials - GOV.UK](#), [Using AI in education: support for school and college leaders - GOV.UK](#) and [Generative AI: product safety standards - GOV.UK](#).

Children with Special Educational Needs and Disabilities (SEND)

We understand that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- Communication barriers and difficulties in overcoming these barriers.
- Children with SEND may not always recognise what is happening to them is abuse.
- Children requiring intimate care or who are more isolated from other may be at increased risk
- Children may be more dependent on adults for care.
- Children may have difficulty understanding the difference between fact and fiction online or understanding the consequences of their online behaviour.

Where there are any concerns raised about the safety and welfare of a child with SEND in school, we will ensure that these will be treated in the same way as with any other child, with careful consideration of any additional needs. In addition, the DSL will always liaise with the SENDCO, and where appropriate, parents and external agencies to ensure that the pupil receives appropriate support.

Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

Young Carers

Our schools recognise that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

Safeguarding Concerns or Allegations about any Staff, including Supply Teachers, Trainee Teachers, Volunteers, or Contractors

[Schools in the Learners' Trust](#) have procedures in place to manage any safeguarding concerns (no matter how small) and provides training to staff so that they understand their responsibility to demonstrate professional curiosity and challenge.

Concerns and allegations that may meet the harm threshold will be addressed as set out in Section one of Part 4 of KCSIE and in line with local RSCP procedures.

All allegations about staff, volunteers and/or contractors should be reported without delay to the headteacher or principal. Where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADO).

Where the headteacher is the subject of an allegation, the report should be made directly to the school's Trust Partner.

Part 4 of KCSIE sets out the definition of an allegation:

Where it is alleged that a person who works or volunteers with children has:

- behaved in a way that has harmed a child, or may have harmed a child, and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Concerns that do not meet the harm threshold against staff including supply staff and volunteers and contractors (known as Low Level Concerns) will be addressed as set out in Section 2 of Part Four of KCSIE and in line with local NYSCP procedures. We will record any low-level concerns using CPOMS.

The governing body is aware that there is a legal duty in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned and failure to refer when the criteria are met is a criminal offence.

Elective Home Education (EHE)

Our schools recognise that many home educated children have an overwhelmingly positive learning experience, however, this is not the case for all, and this can sometimes mean that some children are less visible to services that are there to keep them safe and supported in line with their needs. Schools will work in partnership with the Elective Home Education Team that is based within the Access to Education Team and report/inform the LA when a child is taken off role. Wherever possible, the schools, LA and other key professionals will coordinate a meeting with parents/carers before a final decision has been made to ensure that the decision is in the best interests of the child. This is particularly important where the child has special educational needs or a disability, and/or a social worker, and/or is otherwise vulnerable. Where a child has an Education Health Care plan; the LA will need to review the plan and work closely with parents and carers.

In line with the School Attendance (Pupil Registration England) Regulations 2024, our schools will ensure they inform the Local Authority of all deletions from the admissions register when a pupil is taken off roll.

Private Fostering

A Private Fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. Private fostering is one form of kinship care, as defined below under 'Kinship Care'.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it **does not** include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. It is recommended the designated safeguarding lead speak to the family of the child involved to check that they are aware of their duty to inform the LA.

Kinship Care

In October 2024, the Government issued statutory guidance on 'Kinship Care', which included of kinship care: *'any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term.'* This covers a wide span from informal arrangements and private fostering to Children in Care fostered by family or friends, and children subject to Court orders proving their family or friends with parental responsibility. This would include:

- Informal arrangements where the carer does not hold parental responsibility, and no Court order has been made but cares for the child with parental consent.
- Private fostering arrangements.
- Where a Child Arrangements Order has been made for the child to 'live with' a kinship carer.
- Where a Special Guardianship Order has been made for a child to live with a kinship carer.
- Where a Looked After Child lives with a family/friend's carer.

Some kinship children will be eligible for Pupil Premium Plus as children who have left care.

Schools are asked to consider how kinship children's wellbeing and educational outcomes can be promoted and how their needs can be recognised and addressed as early as possible. Kinship children have sometimes experienced trauma and may feel different than children who live with their parents.

The statutory guidance also extends the role of the Virtual School to promote the educational outcomes of all kinship children.

Each local authority is required to publish a multi-agency Kinship Local Offer:

[Kinship care: statutory guidance for local authorities](#)

Children who are Looked After (CLA)

Our schools have a named designated teacher for Children who are Looked After who works closely with the Virtual School Team and the Local Authority. We have a separate CLA policy which gives further detail about CLA procedures.

Protocol for responding to self-harm in school

Self-harm is when someone hurts or injures themselves. It can be used to describe cutting, scratching, burning, taking overdoses, punching oneself, substance abuse, self-poisoning, unsafe sex etc. In some cases, this can be a continuum ranging from a behaviour which has strong suicidal intent to behaviour which is part of a coping mechanism.

The DSL in each school is responsible for ensuring that staff members are aware of how to recognise and respond to self-harm, and how to report and record all instances on the child's electronic safeguarding chronology for example CPOMS. The protocol includes:

- listening to the disclosure in a calm and non-judgemental way
- reporting the self-harm to the DSL as soon as possible
- being aware of any health and safety/first aid needs around the incident.

The DSL will keep accurate records of the incidents, liaise with local services and contact parents at the appropriate time, including signposting if necessary.

Supporting children who are lesbian, gay, or bisexual

The fact that a pupil is a lesbian, gay, or bisexual is not a risk factor for harm; however, our schools recognises that these children, or those perceived to be lesbian, gay, or bisexual, may be more vulnerable to discriminatory bullying. Our schools will take appropriate steps to prevent and respond to bullying and ensure that all pupils feel safe, respected, and supported.

Pupils who are questioning their gender

Our schools recognise that some pupils may question their gender and that they may have additional vulnerabilities, including mental health or psychosocial needs. Schools will take time to understand the individual circumstances of pupils who are questioning their gender and will respond on a case-by-case basis, acting in the best interests of the pupil and taking account of the safety and wellbeing of all pupils. Our schools will take time to understand the thoughts and feelings of children who are questioning their gender, and we will be professionally curious about the full range of experiences and remain aware of the potential vulnerabilities of children questioning their gender.

Our schools will not initiate action relating to social transition. Where a request for support is received from a pupil or their parent, schools will respond in accordance with the latest DfE guidance, taking a cautious approach, involving the DSL and, except where doing so would place the pupil at risk of significant harm, working in partnership with parents.

Where a pupil discloses that they are questioning their gender or requests support in relation to social transition, staff will listen carefully and respond sensitively. Staff will not promise confidentiality and will explain that any information shared may need to be discussed with the DSL to safeguard and promote the pupil's welfare.

Our schools will maintain a culture in which bullying is not tolerated and will ensure that pupils who are questioning their gender receive appropriate safeguarding support and are able to raise concerns with trusted members of staff.

The DSL will ensure that appropriate records are maintained of any requests relating to social transition, the factors considered, decisions made, and the reasons for those decisions. Records will be kept securely in accordance with the Data Protection Policy.

We will endeavour to work with parents or carers to determine what is in the best interests of the child as well as considering any clinical evidence or advice and seeking any additional non-clinical professional advice where relevant (for example from the SENCO). We will consider everything that

could be affecting a child, including whether they have any wider health issues or neurodiversity.

When discussing requests with children and parents and carers time will be taken to sensitively explain the constraints on social transition set out in KCSIE para 252-282. We will explain that supporting any degree of social transition will not include allowing access to toilets, changing rooms or boarding or residential accommodation designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single sex PE.

Restrictive interventions, including use of reasonable force

There are limited circumstances when it is appropriate for staff in schools to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances.

Our schools adopt a policy 'Positive Behaviour Support including Restraint'. Schools will always work within the context of the law and should always depend on individual circumstances including consideration of whether the child has Special Educational Needs or Disabilities (SEND), mental health or with a medical condition. These decisions will also align with our duties under the Equality Act 2010 and the Public Sector Equality Duty and align with the statutory guidance.

[Restrictive interventions including the use of reasonable force in schools guidance](#)

Rules on single sex spaces/single sex sports

Pupils are not allowed into toilets, changing rooms, showers that or designated for the opposite biological sex with no exception. Our schools will provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time).

Our schools will comply with statutory guidance we must not allow children into toilets designated for the opposite biological sex. This includes where we are responding to a request to support any degree of social transition for children who are questioning their gender.

Our schools provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year. When responding to a request to support any degree of social transition, we must not allow a child access to changing rooms designated for the opposite sex.

If a gender-questioning child does not want to use the toilet, changing rooms and showers designated for their sex, schools will consider whether they can provide an alternative toilet, changing or washing facility without compromising the provision of single-sex facilities. These alternative arrangements will not compromise the safety, comfort, privacy or dignity of the child or of any other children. We will keep records of these situations.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case, to comply with statutory guidance, there must be no exceptions. Where there are no safety concerns and a child makes a request relating to how they participate, we will need to consider the request in light of the advice on "considering requests for support with social transition". This means that we will take into account all the relevant factors, including whether supporting social transition is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE.

Roles and Responsibilities

The Governing Body (Champions and Trustees)

Trustees of the Learners' Trust are accountable for ensuring the effectiveness of this policy and our compliance with it. They will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via the school's website and has been written in line with Keeping Children Safe in Education, Local Authority advice and the requirements of Rotherham Safeguarding Children Partnership's policies and procedures.
- A member of the senior leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is a named deputy member of staff identified to deal with any issues in the absence of the designated safeguarding lead professional. There will always be cover for this role.
- Schools contribute to inter-agency working in line with Working Together to Safeguard Children.
- Schools have due regard to the **Prevent Duty** Guidance 2011, under Section 26 of the Counterterrorism and Security Act 2023, which aims to prevent children and young people from being drawn into extremism and terrorism. This may include making a referral to the **Channel** programme which provides a mechanism for schools to make referrals (via MASH) if they are concerned that an individual might be vulnerable to radicalisation.
- Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". School has due regard to the **mandatory** reporting duty which came into force in October 2015, of the **Female Genital Mutilation Act 2003** which places a **statutory duty** on all teaching and support staff (along with social workers and healthcare professionals) to report to the police where they discover that FGM appears to have been carried out on a girl under 18 years.
- All staff receive a safeguarding induction and are provided with a copy of this policy, Part One of '*Keeping Children Safe in Education*' and the staff behaviour policy/code of conduct.
- All staff undertake appropriate safeguarding and child protection training that is updated regularly; in addition, all staff members will receive safeguarding and child protection updates (for example, via e-mail, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with Safer recruitment practices are followed in accordance with Part Three of Keeping Children Safe in Education and also they remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.

The Governing Body (School Champions / Trustees) will:

- Facilitate a whole school-approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of our school's process and policy development

- Evaluate and review this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Appoint a senior board level leader to monitor the effectiveness of this policy in conjunction with the full governing body, this is always a different person to the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such trainings is regularly updated and is in line with advice from the safeguarding partners
- Ensure that schools have appropriate filtering and monitoring systems in place, and review their effectiveness,
- Ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources, and support.
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the body fails to comply.

Safeguarding will be a standing item on Governing Body agendas. They will receive regular updates throughout the academic year and a minimum of one full safeguarding report from the Designated Safeguarding Lead. Updates and the report will show all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils

Additionally, the Trust Partner is responsible for receiving concerns/allegations about the headteacher or principal and agreeing any appropriate course of action for investigation. This includes liaison with the Local Authority Designated Officer (LADO) if the matter meets the criteria for being considered as an allegation.

The Headteacher

The Headteacher is responsible for:

- Identifying a member of the senior leadership team to be the Designated Safeguarding Lead (DSL).
- Identifying additional members of staff to act as the Deputy Designated Safeguarding Leads (DSL) thus ensuring that there is always cover for the role.
- Ensuring there are robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.
- Ensuring that the policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaising with the LADO in the event of an allegation of abuse being made against a member of staff.

The Designated Safeguarding Lead

- They will carry out their role in accordance with the responsibilities outlined in **Annex B** of Keeping Children Safe in Education. The DSL will provide advice and support to other staff on child welfare and child protection matters. At least one other person in each school is

designated as the Deputy Safeguarding Lead, they will be responsible for the role if the DSL is absent.

- Act as the main point of contact with local safeguarding partners and keep up to date with local safeguarding arrangements.
- Take lead responsibility for promoting the educational outcomes of vulnerable children. They need to ensure that:
 - Information is shared about welfare, safeguarding and child protection issues with teachers and leaders
 - There is a particular focus on children with social workers
 - Staff know who these vulnerable children are
 - They understand these children's academic progress & attainment
 - They maintain a culture of high aspirations for vulnerable child
 - They support teaching staff to identify challenges these children may face and the academic support and adjustments that could be made
 - Liaise with the mental health lead in school and, where available, the Mental Health Support Team when safeguarding concerns are linked to mental health
 - Information sharing and managing the child protection file and adhere to record keeping and information sharing guidance in KCSIE
 - Receiving, reviewing and transferring safeguarding information at all transition points, including in-year move.
- Undertake safeguarding training as recommended by Rotherham Safeguarding Children Partnership and update this training every two years. Additionally, the DSL will receive regular updates to safeguarding training via the termly Education Safeguarding Forum, e-bulletins, e-learning, etc
- Liaise with Children's Social Care and other agencies where necessary and make referrals of suspected abuse to Children's Social Care, take part in strategy discussions and other interagency meetings and contribute to the assessment of children, including Family Help assessments.
- Maintain accurate electronic or written records and child protection files ensuring that they are kept confidential and stored securely.
- (When a child leaves the school), contact the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an appropriately agreed manner. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery or, via electronic transfer using CPOMS
- Ensure that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained to the appropriate level recommended by Keeping Children Safe in Education and the Rotherham Safeguarding Children Partnership.
- Lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place). This should be explicit in the role of the job holder's job description, Keeping Children Safe in Education.

Furthermore, the DSL and Deputies must ensure that they make themselves available to respond to urgent safeguarding matters and for ensuring that they comply with statutory duties in line with Annex B.

To ensure continuity of safeguarding responsibilities, we implement robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances. Our schools use a confidential shared mailbox to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

Children who are absent from education

Our schools recognises that children who are absent from education for long periods/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation, particularly county lines. We will identify early any children who are persistently absent to prevent them becoming missing from education in future.

Children missing education are defined as children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation and becoming NEET (not in education, employment or training) later in life.

Knowing where children are during school hours is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation and/or the radicalisation of children. We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

All staff in school understands the importance of regular attendance and our schools have appropriate procedures to follow for unauthorised absence in place and for dealing with children that go missing from education, particularly on repeat occasions. This helps identify the risk of abuse and neglect, including sexual exploitation and helps prevent the risks of their going missing in future. All staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and Forced Marriage.

More information on children missing education is contained in Annex A of Keeping Children Safe in Education

Identifying children and young people who may need community based Early / Family Help

Family Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to commencement of adulthood. We will work with local agencies in Rotherham to put processes in place for the effective assessment of the needs of individual children who may benefit from Early Help services.

Early Help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention (Working Together to Safeguard Children 2026).

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether they have a statutory Education, Health, Care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from home, education or care
- Has experienced multiple suspensions, is at risk of permanent exclusion from school, an in Alternate Provision or a Pupil Referral Unit
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs
- Is at risk of 'so-called honour' based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child.

Our schools will support local organisations and agencies to work together to support families within the early help / Family Help service and will:

- Identify children and families who would benefit from community based and/or targeted early help.
- Undertake an assessment of the need for community based and/or targeted early help which considers the needs of all members of the family.
- Ensure good ongoing communication, for example, through regular meetings between practitioners who are working with the family.
- Co-ordinate and/or provide support as part of a plan to improve outcomes. This plan will be designed together with the child and family and updated as and when the child and family needs change.
- Engage effectively with families and their family network, making use of family group decision-making to help meet the needs of the child.

All staff will be made aware of the local early help process and understand their role in it.

Supporting Children Requiring Mental Health Support

We recognise that school has an important role to play in supporting the mental health and wellbeing of our pupils.

We ensure all staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

We ensure staff fulfil 4 key roles to support children with their mental health and wellbeing namely:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one

- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

Whilst all staff are able to observe and support the mental health and wellbeing of their pupils and learners, we also have a mental health lead in place. The Mental health lead supports our setting to embed a whole school / college approach to mental health and wellbeing by following DfE guidance [Promoting children and young people's mental health and wellbeing](#).

Furthermore, we commit to:

- Ensuring that clear systems and processes are in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems and there is an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of our pupils.

Safeguarding children with medical needs

Our schools support pupils at school with medical conditions and allergies and are properly supported so that they have full access to education, including school trips and physical education. Our school champions / Trust Partner / Trustees will ensure that arrangements are in place in school to support pupils with medical conditions and allergies, including recording, reporting and tracking information / training yearly. Our Trust partner and Trustees will ensure that school leaders consult with health and social care professionals, pupils and parents ensuring that the needs of children with medical conditions and allergies are properly understood and effectively supported.

Schools in the Learners' Trust recognise that although serious incidents of harm and even child deaths have occurred in school and college settings, a child having a medical condition (including allergies and conditions requiring delegated healthcare tasks) is not in itself an indicator that a child is at greater safeguarding risk. In the event of a clinical incident taking place in school / college, the responsible healthcare professional, will work in conjunction with our DSL to consider whether any safeguarding duties has been triggered and whether any further action is required based on the nature of the incident.

The schools follow the DfE guidance [Allergy safety in schools](#) and [Supporting pupils with medical conditions at school](#).

Safer Recruitment

At all times, the Headteacher and Governing Body will follow relevant guidance in Keeping Children Safe in Education September (Part 3 Safer Recruitment) and from The Disclosure and Barring Service (DBS): [Disclosure and Barring Service - GOV.UK](#)

- We will ensure school champions, Trust Partners and staff on recruitment panels undertake all appropriate safer recruitment training as outlined in KCSIE September.
- We will use the recruitment and selection process to deter, reject or identify unsuitable candidates.
- Our selection and recruitment policy will include all appropriate checks on staff and suitability including DBS checks. Regarding the recruitment of volunteers our policy will be rigorous and follow DBS guidance taking into account regulated and supervised activity.
- We will always act reasonably when making decisions about the suitability of any prospective employee based on checks and evidence, including criminal record checks (Disclosure and

Barring Service), barred list checks and prohibition checks (for teaching posts), together with references and interview information.

- We will ensure that all staff and volunteers have read the staff behaviour policy, staff code of conduct and understand that their behaviour and practice should be in line with it.
- In addition, as part of the shortlisting process, schools will consider carrying out online searches as part of the due diligence process relating to shortlisted candidates. Our schools will inform shortlisted candidates that online searches may be done as part of the recruitment process.

Our schools will maintain a Single Central Register of all safer recruitment checks carried out in line with statutory requirements. The Single Central Register will contain information on all staff members (this includes contractors and supply staff) on the following:

- An identity check
- A barred lists check
- An enhanced DBS check/certificate
- An overseas check if required
- A prohibition from teaching check
- A section 128 check if applicable (for management positions in independent schools, free schools and academies)
- A check of professional qualifications
- A check to establish the person's right to work in the UK
- Further checks on people who have lived or worked outside the UK
- Any other relevant information we feel should be included on the SCR such as volunteers, childcare disqualification, safeguarding and safer recruitment training records, etc.

Safer Recruitment training is available to all relevant staff and school champions who are involved in the recruitment process.

Managing Allegations against Staff (including Governors, volunteers, supply teachers and agency staff)

This section is based on 'Section 1: Allegations that may meet the harm threshold' in part 4 of Keeping Children Safe in Education (KCSIE) 2026.

Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children in our schools. We recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. We promote an open and transparent culture in which **all** concerns about staff (including **low level concerns***) are shared with the DSL/Headteacher and are recorded and dealt with appropriately.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

We will take all possible steps to safeguard our children and to ensure that the adults in our schools are safe to work with children. We will always ensure that the procedures outlined in the RSCP Child Protection Procedures: Chapter 5.2 and Part 4 of the statutory guidance Keeping Children Safe in Education are adhered to.

Any allegations against staff (including school champions, volunteers, supply teachers and agency staff) that indicate that they may have:

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

will be reported immediately to the Headteacher or the Designated Safeguarding Lead if the Headteacher is not present.

If an allegation is made or information is received about an adult who works in our schools which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the Headteacher immediately. This would also include where relationships and 'associations' that staff have in school and outside (including online) may have an implication for the safeguarding of children in our schools.

The Headteacher will inform the **Local Authority Designated Officer (LADO)** within one working day, following the guidance in KCSIE. The Headteacher or the school's Trust Partner will ensure that we will take part in further information gathering discussions and allegation meetings as required by the LADO. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

If the allegation concerns the Headteacher, the person receiving the allegation will immediately inform the Trust Partner who will consult as above, without notifying the Headteacher first.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Trust Partner should contact the **Local Authority Designated Officer (LADO)** on **01709 336491** or email LADO@rotherham.gov.uk.

Low Level Concerns

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

Keeping Children Safe in Education gives examples of such 'low-level' concerns which could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language
- humiliating children

Staff will be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (KCSIE Part four) are shared responsibly with the DSL/Headteacher, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

Low-level concerns should be recorded in writing, including:

- name of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

Referral to DBS

The name of any member of staff considered not suitable to work with children will be referred to the Disclosure and Barring Service (DBS) with the advice and support of Human Resources and in accordance with the DBS Referral Policy.

Child on Child Abuse (including sexual violence/assault and sexual harassment)

Our schools have a zero-tolerance approach towards all forms of child-on-child abuse and all school staff are aware that any child-on-child abuse is unacceptable, that pupils are capable of abusing their peers, and no form of any such abuse is ever dismissed as “banter” or “part of growing up”.

For the purposes of this policy, “consent” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice.

Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

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

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.
 -

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

For the purposes of this policy, “**making or sharing of nude or semi-nude images and/or videos**” refers to the creation, possession or sharing of nude or semi-nude images and/or videos involving anyone under the age of 18. This includes consensual and non-consensual sharing, AI-generated content where it depicts a child, and content shared online or offline.

“**Deepfakes**” and “**deepnudes**” refer to digitally manipulated or AI-generated images, audio or videos that falsely depict a person. Where these involve nude or semi-nude images of a child, they will be managed in accordance with the trust’s procedures for responding to the making or sharing of nude or semi-nude images and/or videos.

Our school staff understand that where there is a safeguarding concern, we will ensure that the child’s wishes, and feelings are considered when determining what action to take and what services to provide. Systems are in place, and well promoted in throughout school, that are easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

We understand that harm committed by children and young people on other children or young people transcends equalities issues. Gender, ethnicity, age, disabilities, sexual identity can all be factors in harmful behaviour, for all children involved. Such abusive behaviour may be either a one-off incident, or may be a continuous experience for someone, that is physical, sexual, or emotional (including verbal) in nature or may be a combination of those factors. It may be inflicted by a single child or young person, in pairs or by groups or gangs. It can be face to face, or in the form of cyberbullying (online via computers, games consoles or mobile phones). It may be exercised between children, and within children’s relationships (both intimate and non-intimate), friendships and wider peer association and can be manifested in many ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence, which aims to cause physical, emotional or psychological harm.

Managing allegations

Allegations of child-on-child abuse, and particularly those involving sexual violence and sexual harassment, should be dealt with on a case-by-case basis and should be led by the Designated Safeguarding Lead (DSL).

The needs and wishes of the child must be paramount in how the allegations are managed from the moment of reporting. Considerations should include how the investigation proceeds and what support the child requires. However, if both the victim and alleged perpetrator are present in the same class, key stage or school it is recommended they are separated immediately so no further unsupervised contact is possible until the investigation is completed. It is also recommended that parents are contacted as soon as possible.

The DSL will record the incident in writing (or add further information if they weren't the person making the initial report) on the school's recording system (CPOMS) and decide what course of action is necessary, with the best interests of the child in mind always. They will work in conjunction with other services if required, such as police and social care.

If appropriate, a referral may be made to children's social services (MASH 336080) and, depending on the nature of the incident, the police. Before doing so, it is important to discuss this with parents and the child, explaining why it is important for other agencies to know and how these agencies will be able to support them.

Possible actions to take

- Immediate support for child (victim)
- Separating pupils in lessons and during the school day
- Contacting parents of both children (victim and alleged perpetrator) unless doing so would put the child at risk from further harm
- Investigation of incident
- Risk assessments – including for both children, location of incident, etc
- Disciplinary action/ specialist, targeted support for alleged perpetrator and their behaviour
- Seeking advice from other agencies, such as social care, police, etc.

Responding to the report

Our first response to a pupil disclosing an incident is vital. The child must be reassured that they will be taken seriously and be kept safe. Immediate action should be taken to ensure the pupil is in a safe space to discuss the incident with a trusted member of staff (this may be in addition to the DSL). It is important to:

- not promise confidentiality at any stage of the process
- only share the disclosure with those people necessary to progress it
- explain to the pupil what the next steps will be and who the information will be passed to
- listen to the pupil carefully, without judgement and be clear about boundaries
- not ask leading questions but use open questions to ascertain the necessary information – where, when, what, etc.

Once the disclosure has been made the member of staff must report this to the DSL for immediate action.

Recording the information accurately

Staff should consider the best way to record the information for the recording system, and must be in line with school's data protection policies and procedures.

The staff member should only record the facts as the pupil presents them; the notes should not reflect the personal opinion or words of the note-taker. It is important to remember these notes/report may become part of a statutory investigation by social care or a criminal investigation by police.

After the disclosure has been made, it is important that the staff member immediately write up a concise and factual summary on the recording/electronic recording system.

Risk Assessment

If there has been a report of physical or sexual violence the DSL should make an immediate risk assessment. The risk assessment must consider:

- the protection and support of the child (victim)
- the child or young person who has displayed the harmful behaviour and further risk
- the risk to other children, staff, etc

It should be reviewed regularly and should be shared with parents, and other agencies as required.

On-going response to protect and safeguard the child (victim)

The following should help shape any decisions made about protecting and supporting the child:

- consider the age and developmental stage of the child, the nature of the allegations and the potential risk of further abuse
- the needs and wishes of the child must be paramount to any decision-making.
- the victim (rather than the alleged perpetrator) should be allowed to carry on in their normal routine, their daily school experience should be as normal as possible to ensure they feel they are in a safe space
- the response to the incident should be proportional and considered on a case-to-case basis – for example, the response for a one-off sexualised name-calling incident will be vastly different to the response for a sexually violent assault, such as rape
- the child may not always disclose the whole picture immediately, it's important that a designated person or trusted adult (of their choice) is available for the pupil to talk to if they need to.
- support for the child may be longer term (could involve social care, police, etc), may eventually require a move of schools or other such measures, these must be led by child and parents.

Safeguarding and supporting the child who has displayed the harmful behaviour

The following should help shape any decisions made about supporting the child or young person who has displayed the harmful behaviour:

- in addition to protecting the victim, consideration must be also given to the alleged perpetrator about their education, safeguarding support and any disciplinary action
- consider the age and developmental stage of the child or young person who has displayed the harmful behaviour, and the nature of the allegations, the pupil may experience stress and anxiety being the subject of allegations and negative reactions from their peers
- consider how you respond to the incident on a case-by-case basis and the child's possible unmet needs in displaying behaviour that may be harmful, sexual physical aggression, etc. Take advice to support your decision-making where necessary.

Sharing nude and semi-nude photos or images (also known as ‘sexting’)

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS).

There is a suggested approach based on guidance from the UK Council for Internet Safety and Department of Science, Innovation and Technology for all staff and DSLs and senior leaders.

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK.](#)

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children’s social care. Where children are living independently from their parent/carers (e.g. if they’ve been excluded from their family home), we will work with the local authority children’s social care team to support them.

Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with data protection policies.

If a current or former pupil makes an allegation directly to the police, the police may approach schools for access to personal data relating to the victim, the alleged perpetrator and/or other witnesses. Again, data protection law supports such sharing where the police require that personal data for the purposes of the prevention or detection of crime, or the apprehension or prosecution of offenders.

The updated Working Together to Safeguard Children guidance clarifies that the Data Protection Act 2018 and General Data Protection Regulations (GDPR) **do not** prevent the sharing of information for the purposes of keeping children safe. 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.

Consent is not required when sharing information for the safeguarding and protecting the welfare of a child. It is also stated that, while encouraged, the agreement of the child and parents is not required to share information, though it is important to explain the reasons for this.

Our schools must be proactive with sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of a child. Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

During disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why. Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved, unless such a discussion could potentially put a pupil at risk of harm.

Training and Induction

Every new member of staff or volunteer should have an induction programme which includes basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record this information and discuss issues of confidentiality. The induction will also remind staff and volunteers of their responsibility to safeguard all children in our schools and the role of the Designated Safeguarding Lead. At induction, all staff will also be provided with a copy of Part One of Keeping Children Safe in Education and will be expected to read this.

In addition to the safeguarding induction, all members of staff will undertake appropriate safeguarding training on a regular basis in accordance with Keeping Children Safe in Education and advice from Rotherham Safeguarding Children Partnership.

The DSL and deputy DSL will attend training courses at least once every two years. They will also receive regular safeguarding updates throughout the school year to keep up with and developments relevant to their role.

In accordance with Part three of Keeping Children Safe in Education all school champions will also undertake training, appropriate to their role, to ensure they can carry out their duty to safeguard all of the children in our schools. The Governing Body will review IT standards and discuss IT with staff and service providers to decide what more needs to be done to support the school in meeting the required standard.

Whistleblowing Policy

Where there are concerns about the way that safeguarding is carried out in one of the schools, staff should refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000. [whistleblowing-and-serious-misconduct-policy](#)

Use of the school premises for non-school activities/extra-curricular activities

Where the school hires or rents out school facilities or the school premises to organisations or individuals, e.g., for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

Where the school provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed.

Schools will ensure safeguarding requirements are included in the lease or hire agreement/contract, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extra-curricular activities and clubs hosted by external bodies will work in collaboration with the schools to effectively safeguard pupils and adhere to local safeguarding arrangements. Staff and volunteers running extracurricular activities and clubs need to be aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff need to understand how they should respond to child protection concerns and how to make a referral to social care or the police, if necessary.

If a school receives an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children. As with any safeguarding allegation, the school will follow all safeguarding policies and procedures, and contact with LADO will be made.

Alternative Provision

Schools will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has demonstrated due diligence regarding all safeguarding checks on staff and the placement will prioritise meeting the pupils needs. At all times the safeguarding of the pupil will remain the responsibility of the home school. Our schools will continue to carry out safeguarding checks and conduct its own due diligence to ensure that the AP is appropriate for meeting each pupil's individual needs.

Schools will ensure that the location of pupils placed at AP is always known and will maintain records of the address of the alternative provider and any subcontracted provision or satellite sites the pupil may attend.

AP placement reviews will take place at least half termly to ensure that pupils are regularly attending and the placement continues to be safe and meets their needs.

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Work Experience

Our schools will ensure that they have the appropriate procedures in place to ensure that providers of work experience have appropriate safeguarding policies and procedures in place. We will not allow someone on the barred list to engage in regulated activity with a pupil on a work experience placement. Where pupils are undertaking work experience at the trust or one of the schools within the trust, an enhanced DBS check will be obtained if the pupil is over the age of 16.

Extra-Curricular Activities & Clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with schools to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to Children's Social Care or the police, if necessary.

Working with parents and carers

Our schools are committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

When new pupils join our schools, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to MASH.

We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have consent, or it is necessary to do so to safeguard a child from harm. Our responsibility is to promote the protection and welfare of all children, and our aim is to achieve this in partnership with our parents.

We will seek to share with parents any concerns we may have about their child *unless* to do so may place that child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns a school has about a child will not prevent the DSL making a referral to MASH in those circumstances where it is appropriate to do so.

To keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details – at least two to be able to make contact with a responsible adult should a concern arise i.e., illness, not being collected at the end of the school day, a child going missing or a safeguarding concern.
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

Schools will retain this information on the pupil file. Schools will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the adult's full details in writing.

When to call the police

When to call the police addresses criminal activity, not safeguarding issues. Safeguarding issues are addressed using the referral process and procedures. Contact with police should ideally be made by a single point of contact from the school. This may be the Headteacher or the DSL to ensure all the relevant information is shared and improve consistency of referrals.

When an incident occurs in which a crime has or may have been committed, schools need to consider whether to involve the police. The school behaviour policy and code of conduct will give further guidance on how to deal with and record such incidents.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we 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 sign the visitors' book and wear a visitor's badge.

Visitors to our schools who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and the organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into our schools any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Relevant Policies

To underpin the values and ethos of our schools and our intent to ensure that pupils are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff Code of Conduct
- Anti-Bullying
- Behaviour: Positive Handling and managing behaviour
- Safer Recruitment and selection
- Whistle-blowing
- Attendance and Children Missing in Education
- IT/Online Safety/acceptable use policy
- Health and Safety including site security
- Harassment and discrimination including racial abuse
- Meeting the needs of pupils with medical conditions
- First aid/Medications Policy/Intimate Care Policy
- Educational visits including overnight stays
- Health and Safety Policy, including fire evacuation and lockdown procedures
- Visits/Trips off site
- Manual handling/Positive/Team Teach Policy
- First aid – [Early years practionner should note the first aid requirements set out in the EYFS Framework](#)

Policy Consultation and Review

This policy will be reviewed in full by the Governing Body on an annual basis. Any changes made to this policy will be communicated to all members of staff.

This policy is available on school websites and is available on request from the school office. We also inform parents and carers about this policy when their children join our schools and through our school newsletters and information sharing.

All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is **September 2027**.

APPENDIX 1

Useful Contact numbers and e-mail addresses/websites:

Local Authority Children's Social Care – Multi-Agency Safeguarding Hub (MASH) for all referrals, advice and support including referral to Early Help and Family Engagement services: 01709 336080.

Duty LADO – 01709 336491.

LADO email (not for referrals) – LADO@rotherham.gov.uk

South Yorkshire Police non-emergency number – 101. In an emergency ring 999.

Did you know you can report non-emergency incidents and access other police services quickly and easily online? Visit www.southyorkshire.police.uk.

Rotherham Safeguarding Children Partnership (RSCP): www.rscp.org.uk.

National Helplines/Websites:

NSPCC Confidential helpline – 0808 800 5000 help@nspcc.org.uk .

Childline – 0800 1111.

www.thinkuknow.co.uk

www.saferinternet.org.uk/

www.swgfl.org.uk

[Keep Children Safe Online: Information, advice, support - Internet Matters](#)

www.pshe-association.org.uk

educateagainsthate.com

[The use of social media for online radicalisation - GOV.UK](#)

[LGfL Home | LGFL](#)

[Safety and Security Online | SWGfL](#)

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