**Transform Trust**

**Child Protection and Safeguarding Overarching Policy**

**2026-27**

| Policy Number | Author | Publication Date | Review Cycle |
|---|---|---|---|
| 200 | Director of Safeguarding & Data Protection | V7 September 2026 | Annual |

## *Aim: To become a Trust of exemplary safeguarding practice across all schools*

### *Transform Trust Safeguarding Statement*

Transform Trust are committed to safeguarding children. **All** staff are expected to share this commitment. Staff take all welfare concerns seriously and encourage children to speak out about anything that worries them, always acting in the best interests of the child.

*All references to Keeping Children Safe in Education will appear as Part/Paragraph Number PX: XX or Part and page number(s).*

**Guardians Strategic Group**

Transform Trust's strategic assurance and improvement group. The Guardians structure brings together specialist networks including Attendance, Behaviour, EAL, Safeguarding, SEND, Pupil Premium and Enhanced Provision to provide support, challenge, policy development, quality assurance and shared improvement across schools. Network findings, risks and impact are reported to the Guardians Strategic Group to inform Trust-wide priorities and provide assurance to executive leaders and trustees.

<table>
<tr><td colspan="8">Transform Trust Trustees<br>Dame Susan Jowett, named Safeguarding Trustee</td></tr>
<tr><td colspan="8">Transform Trust Accountable Officer: Rebecca Meredith, CBE<br>Chair of Guardians Group – Kelly Lee (Chief School Improvement Officer – CSIO)<br>Headteacher Chair – Claire Paparozzi</td></tr>
<tr><td colspan="8">Trust Centre Safeguarding Team: Claire McKendrick, Mary Farmer</td></tr>
<tr><td>Attendance Group</td><td>Behaviour Group</td><td>Enhanced Provision Panel</td><td>HR (Safer Recruitment including LADO)</td><td>EAL Group</td><td>Safeguarding Group</td><td>Pupil Premium</td><td>SENDCo Group</td></tr>
<tr><td>Chair: Lee Noble, Exec Head Highbank Primary/ Whitegate Primary</td><td>Chair – Claire Paparozzi, Head Teacher, William Booth</td><td rowspan="2">Chair – Emma Hampton, Director of Inclusion</td><td rowspan="2">Rachel Hannon – Chief People Officer</td><td>Chair: Arvinder Badwal, Head of School, Ravensdale Juniors</td><td>Chair: Matt Barnham, Head of School Rosslyn Park</td><td>Chair: Adam Jevons-Newman</td><td rowspan="2">Chair: Jo Jeffs Trust SEND Headteacher Associate</td></tr>
<tr><td>Trust Lead: Emma Hampton</td><td>Trust Lead: Trish Wilson</td><td>Trust Lead: Emma Hampton</td><td>Trust Lead: Claire McKendrick</td><td>Trust Lead: Emma Hampton</td></tr>
<tr><td colspan="8">Guardians Professional – Mary Farmer</td></tr>
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### *Transform Trust Board*

Our named Safeguarding Trustee is Dame Susan Jowett. Termly meetings are held with our Safeguarding Trustee, CEO, CSIO and the Director of Safeguarding & Data Protection. Our Safeguarding Trustee fulfils the same role as that of a Safeguarding Governor in school, except this is for the whole Trust. In addition, the CEO reports each half-term to the Trust Board on key safeguarding matters including data.

All Trustees receive appropriate safeguarding training in line with KCSIE P2: 82.

In the event of any allegations made against the CEO or another Trustee, our named Safeguarding Trustee will liaise with our Chief People Officer and the appropriate agency as advised by the Chief People Officer.

Our Chair of Trustees is also responsible for the overview of all matters relating to safeguarding across the Trust. Our Chair of Transform Trust Board is Mike Butler. Mike can be contacted through the Trust Governance Professional, Ruth Palmer: ruth.palmer@transformtrust.co.uk.

### *Trust Centre Team*

Transform Trust have a dedicated team at Trust Centre who have responsibility for all things safeguarding. They are held to account by the Safeguarding Trustee and report to the Guardians Group.

| | |
|---|---|
| Claire McKendrick, Director of Safeguarding and Data Protection, Lead DSL for the Trust | Claire.mckendrick@transformtrust.co.uk<br>07929 521578 |
| Rebecca Meredith, CEO, CBE | Pa.ceo@transformtrust.co.uk |
| Kelly Lee, Chief School Improvement Officer (CSIO) | Kelly.lee@transformtrust.co.uk |
| Mary Farmer, Guardians Professional | Mary.farmer@transformtrust.co.uk<br>07854 094078 |
| **Extended Team** | |
| Emma Hampton, Director of Inclusion | Emma.hampton@transformtrust.co.uk |
| Jo Jeffs; Trust SEND Associate Headteacher | Jo.jeffs@transformtrust.co.uk |
| Rachel Hannon, Chief People Officer (For all LADO inquiries or concerns). | Rachel.hannon@transformtrust.co.uk<br>0115 9825090 Option 2 |

### *Transform Trust Out of Hours arrangements*

At Transform we are committed to safeguarding of our children, **including** out of hours. The Trust office number (0115 9825090 option 1) and is available during and outside school hours, weekends and school holidays. For **urgent** safeguarding concerns please call the office number, and it will be diverted to one of the safeguarding team.

### *School Safeguarding Team*

School's must have a Lead Designated Safeguarding Lead who is appointed by the Leadership Team and the safeguarding element of their role must form an explicit part of the persons job description. The Safeguarding team for King Edward Primary School is:

| Name | Role | Contact details |
|---|---|---|
| Emma Estell | Headteacher and Lead DSL | eestell@kingedward.notts.sch.uk |
| Michael Vere | Deputy DSL | mvere@kingedward.notts.sch.uk |
| Amy Binks | DSL | abinks@kingedward.notts.sch.uk |
| Pauline Callahan | DSL | pcallahan@kingedward.notts.sch.uk |
| Luke Braybrooke | DSL | lbraybrooke@kingedward.notts.sch.uk |
| Laura Ellis | DSL | lellis@kingedward.notts.sch.uk |
| Luke Braybrooke | Attendance Lead | lbraybrooke@kingedward.notts.sch.uk |
| Amy Binks | SENDCO | abinks@kingedward.notts.sch.uk |

### *Safeguarding Link Governor*

Transform Trust expects every school to appoint a named Safeguarding Link Governor who provides strategic oversight and challenge.

The Safeguarding Link Governor for KEPS is Phee Smith psmith@kingedward.notts.sch.uk

### *Chair of Governors*

The Chair of Governors is also responsible for having an overview of all matters relating to the school including Safeguarding. They will also be the person who should be contacted if there is an allegation made against the Headteacher. The Chair of Governors for KEPS is Phee Smith psmith@kingedward.notts.sch.uk

### *Local Authority*

Although KEPS is part of Transform Trust we also follow the safeguarding arrangements for Nottinghamshire County Council.

### *Other Policies, protocols and Guidance documents to support this policy include:*

- *Behaviour*
- *CCTV*
- *Community Incident Protocol 2026 (Trust)*
- *Complaints*
- *Confidential Reporting (Whistleblowing)*
- *Data Protection*
- *Employee Code of Conduct*
- *Equality*
- *Health & Safety Trust Policy and school's own Health and Safety procedures*
- *Management of Allegations (contained within the Disciplinary Policy)*
- *Offsite Trips Guidance*
- *Online/E-Safety Policy (including filtering and monitoring arrangements for school and Trust devices)*
- *Restrictive Physical interventions and Use of Reasonable Force Guidance.*
- *Safer Recruitment (including appropriate checks)*
- *Staff Induction (school's own local procedures)*
- *Supporting children with medical needs*
- *Use of Mobile phones*

## Introduction

We expect that our staff, governors, and all visitors fully recognise the contribution the Trust and schools make to safeguarding children. We recognise that the safety and protection of all children is of paramount importance and that all staff, including volunteers, have a full and active part to play in providing family help or early help protecting children from harm. We believe that our Trust and schools should provide a caring, positive, safe and stimulating environment, which promotes all children's social, physical, emotional and moral development. In delivering this ambition, we will adhere to the principles set out in the Trust's Safeguarding Policy as well as the Local Authorities guidance and procedures for supporting families in our communities.

Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of everything we do, and by every individual and agency playing their full part; working together to meet the needs of our most vulnerable children; in line with Working Together to Safeguard Children (March 2026) and Keeping Children Safe in Education (September 2026).

Where the guidance states **"must"** we consider this to be legal and we will need to do it. Where something is recommended as best practice, we will use the word **"should".**

### *The aims of our Policy are to:*

- Ensure that the child's lived experience remains central to safeguarding decision-making. Where information is shared about circumstances at home, family context, significant life events or changes in a child's routine, this should be recorded appropriately on MyConcern. Recording this contextual information supports

professional curiosity and helps staff understand changes in presentation, behaviour, attendance, emotional wellbeing, relationships or collection arrangements, enabling concerns to be considered within the wider context of the child's life.

- Confirm that the child's development is supported in ways that will foster security, confidence and independence.
- Raise the awareness of teachers, non-teaching staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse, including Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE) and Honour Based Violence (HBV).
- Sexual Violence and Sexual Harassment (SVSH) - Guidance refers to "Perpetrators" and "victims", it is important that we remember that all children involved are likely to be a victim in some way and therefore these terms should not be used with the child. Within Transform Trust we refer to this as "child who has been harmed" and "child who has displayed harmful behaviours"
- Confirm the structured procedures to be followed by all members of each school community in cases of suspected harm or abuse.
- Emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child safeguarding, health and safety and other safeguarding responsibilities.
- Emphasise the importance of maintaining and implementing appropriate safeguarding policies, procedures and arrangements of those service providers who use the school's premises through extended schools or provide any other before and after school activities.
- Confirm the working relationship with the Local Authority agencies such as Children and Families Direct, the LA Safeguarding Board, and other agencies with similar services in neighbouring authorities. Working Together to Safeguard Children (March 2026) outlines how the agencies should work together.
- Highlight the working relationship between the school and the Trust's Safeguarding Team.
- Following the publication of 'Meeting Digital and Technology Standards in Schools and Colleges' (updated March 2023) and KCSIE 2026, we ensure that all staff are aware of our filtering and monitoring duty. Senior leaders work closely with Governors, the Lead DSL and IT service providers in all aspects of filtering and monitoring.

## Definition of Safeguarding/Child Protection

**All** staff must understand that Safeguarding and Child Protection are two different things:

- **Safeguarding is** everyone's responsibility and applies to every child and adult who work and/or visit our schools.
- **Child protection procedures** are used for children and young people who have been significantly harmed or are at risk of such harm, and work to support the family with external agencies such as social care.

***"We promote a culture of Safeguarding through policy application and curriculum opportunities. We must remember that it could happen here"***

*Guardians Group 2023.*

KCSIE 2026 states that a schools should have a child-centred and coordinated approach to safeguarding and this is mirrored by the work that we do as a Trust. P1:3 states that for the purpose of the Guidance, Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's mental 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.

Our Safeguarding Policy must apply to **all** staff, Governors, volunteers, and visitors to the Trust or any of our schools.

### Transform Trust Safeguarding Non-Negotiables

The following Trust-wide safeguarding non-negotiables apply across all Transform schools and sit alongside KCSIE 2026 and local safeguarding partner procedures:

- Safeguarding is everyone's responsibility and all staff and volunteers must act, record and escalate concerns without delay.
- Attendance information must be treated as safeguarding information and triangulated with SEND, behaviour, welfare and family context where concerns emerge.
- Children who have a known SEND need, disability or medical condition are supported to feel safe in school and adaptations are made to give them a platform to share any concerns that they have.
- Information regarding changes to any lived experience for the child should be logged on MyConcern such as parental separation or bereavement at the point it becomes known to professionals.
- Filtering and monitoring information must be reviewed as part of safeguarding oversight and reported through school governance and Trust assurance routes.
- Safeguarding records must use factual, professional and child-centred language. Staff must avoid labels about the child and ensure that we are referring to incidences or behaviours rather than labelling a child e.g. “it is believed that the chid is not being honest about…” rather than “the child is a liar”
- Safeguarding concerns linked to medical needs, allergies, transport, supervision ratios or school activities must be considered through a safeguarding lens and records must be cross referenced.
- When recording any injury or mark, a body map must be used by the person completing the concern log. Body Maps are available on MyConcern and must be used – remember to describe the size, direction and colour of any mark.

## Responsibilities

### *Transform Trust:*

Transform Trustees and the Trust’s Safeguarding team are responsible for ensuring the safety and well-being of all children and staff across the Trust. The Trust will provide support in the form of:

- Regular briefing sessions via the Guardians Safeguarding Network for school DSLs and other members of the safeguarding team the school feel appropriate.
- Each school will have a Safeguarding and Inclusion Strategic Implementation Cycle development plan and report throughout the academic year (replacing safeguarding spotlights).
- Termly safeguarding briefings for Governors.
- Access to a range of safeguarding training.
- Support for safeguarding colleagues who may need to present and/or attend court on safeguarding matters.
- Provide advice, support, and challenge for school DSLs to talk through concerns and next steps.
- Any Trust Centre staff who are based, or work in schools, will be required to follow the school’s own Safeguarding Policies.

The Trust mandates that all schools use the online safeguarding recording system MyConcern. The Trust’s Safeguarding team will also conduct regular reviews of the MyConcern system for each school to look for learning points and best practice.

We will also run our own ‘Internal Case Reviews’ and conduct ‘No Notice’ visits when there has been a serious incident relating to a child, including injuries on school site, to ensure that our processes are robust.

As part of the Trust's commitment to safeguarding, we highly recommend that all safeguarding colleagues in schools' access our 'reflective practice' (previously referred to as supervision) service. The Director of Safeguarding & Data Protection leads this support. Working Together to Safeguard Children (2026) states "Practitioners should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively" (Pg 111), and whilst KCSIE 2026 does not mandate supervision, we as a Trust feel that this is a key factor in effective case management as well as supporting our colleagues in schools.

The Trust have a clear process for managing strategic oversight of safeguarding practice in our schools. This includes annual Safeguarding and Inclusion Strategic Implementation cycle, case conferences and support for escalation. We will support schools and the Local Authorities with any Rapid Reviews, Local Child Safeguarding Practice Reviews (LCSPR) as well as ensuring our own Trust processes mirrors these external review processes. **Refer to Appendix 1: Transform Safeguarding Support & Intervention.**

***The Governing Body will:***

- Ensure one of their members is nominated to liaise with the Trust, the Local Authority and/or partner agencies on issues of child protection in relation to safeguarding and in the event of allegations of abuse made against the Headteacher or member of the Governing Body.
- Ensure that all staff, Governors and volunteers are aware of the indicators of abuse and neglect as outlined in KCSIE, 2026 –P1:24-28. This includes the four main types of abuse - physical abuse, emotional abuse, sexual abuse and neglect.
- Ensure there is no period where there is no appointed safeguarding governor e.g., after a member resigns and before another is appointed. If necessary, a governing body will provide a transition period where there will be two appointed governors.
- Ensure that the school has a Child Protection/Safeguarding policy; Staff Conduct policy and appropriate procedures in place; operates safer recruitment; undertakes appropriate checks on staff and volunteers and has procedures for dealing with allegations against staff and volunteers that all comply with the Local Authorities Safeguarding Board - Local Authority Designated Officer (LADO).
- Ensure that each school creates a culture of safer recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might pose a risk to children (Part three: Safer Recruitment, KCSIE 2026).
- Ensure that the school has appointed a member of staff of the school's leadership team to the role of Senior DSL.
- Ensure the school keeps an up-to-date Single Central Record of pre-employment checks, specifying when the check was made and when it will be renewed.
- Monitor the adequacy of resources committed to child safeguarding, and the staff and Governor training profile.
- Recognise that neither it, nor individual Governors, have a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against staff).
- Make sure that the child safeguarding policy is available to parents and children on request.
- Ensure this policy and practice complement other policies e.g., anti-bullying including cyber bullying, health and safety, to ensure an integrated model of safeguarding operates across the school.
- Ensure that relevant staff have "due regard to the relevant data protection principles", which allow them to share (and withhold) personal information (KCSIE 2026 P1:102-104.
- Ensure that all Governors receive appropriate safeguarding training, including information about online safety (KCSIE P2:85). Governors are also expected to read Parts 1 & 2 of KCSIE.

***The CEO for the Trust Centre and Headteachers for schools will ensure that:***

- The policies and procedures adopted by the Trustees and Local Governing Bodies are followed by <u>all</u> staff.

- The policy is reviewed and updated whenever it is required, at a minimum this will happen annually.
- The policy is available publicly on the school website.
- Designated staff review the policy in consultation with the Trust and any guidance from the Local Authority.
- Sufficient resources and time are allocated to enable the designated persons and other staff to discharge their responsibilities including taking part in strategy discussions and other multi-agency meetings, to contribute to the assessment and support of children and young people and be appropriately trained.
- Each school and the Central team must maintain a Single Central Record which includes all staff, agency staff, contractors and volunteers (including Governors). The Single Central Record will hold information on recruitment checks, DBS checks, right to work, as well training records.
- All staff and volunteers feel able to raise their concerns about poor and unsafe practice in regard of children, and such concerns are addressed in a timely manner in accordance with agreed policies.
- School staff are sensitive to signs that may indicate possible safeguarding concerns. This could include, for example, poor or irregular attendance, persistent lateness, children who are absent from education, forced marriage or female genital mutilation.
- All staff, Governors and volunteers should undertake appropriate (to role) child safeguarding training, which is updated regularly, in line with Transform Trust guidance.
- Will be responsible for overseeing that all staff and visitors to the school site are always wearing the appropriate ID badge.
- All staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners.
- The school and therefore the Headteacher will be responsible for ensuring the safeguarding of any child placed in Alternative Provision. The Trust has processes in place which outline expectations and required checks for using Alternative Provisions. In addition, we also follow national guidance for Alternative Provision

***Designated Safeguarding Leads will:***

- Have their roles explicitly defined in their job descriptions.
- There will always be a DSL available during the time schools are open. Schools work closely with the Trust to ensure there is out of hours support for professionals. If school is not contactable the Trust can be contacted on 0115 9825090 option 1.
- Be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.
- Undergo updated child safeguarding training every year, normally during the admin day in at the start of autumn term.
- Liaise with relevant agencies in accordance with the Local Authority procedures when referring a child where there are concerns about possible abuse or harm.
- Where there are concerns about a member of staff's suitability to work with children, contact the Trust's Chief People Officer and the Local Authority Designated Officer (LADO). Concerns should be referred straight to the Headteacher and not discussed with other colleagues, if the concern is about the Headteacher then the staff member should contact Rachel Hannon (Chief People Officer) immediately. Rachel can be contacted by emailing Rachel.hannon@transformtrust.co.uk or calling 0115 9825090 option 2.
- Be able to access the contents of the Local Authority procedures and personnel procedures (as identified by Transform Trust) and make these accessible to all staff.
- Ensure all staff, including supply staff, visiting professionals working with children in the school and volunteers are informed of the names and contact details of the DSLs and the school's procedures for safeguarding children.
- Support staff who attend strategy meetings, looked after reviews and/or case conferences.

- Support staff and volunteers who may find safeguarding issues upsetting or stressful by enabling them to talk through their anxieties and to seek further support from the school leadership group or others as appropriate.
- Support staff to reflect on the information they hold about children and provide an alternative perspective on issues to promote a better understanding of what may or may not be concerning.
- Take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- Ensure involvement of other designated leads e.g., where there are concerns about a child who is 'looked after'.
- Ensure that all staff and volunteers are trained on how to make a referral.
- Ensure that MyConcern is used effectively for all safeguarding matters. Where staff don't have access to MyConcern they should have immediate access to paper copies of the forms.
- Records of concerns are kept on MyConcern, and that all concerns are reviewed in a timely manner. DSLs should add a file note to each concern outlining any decisions, including rationale, next steps and follow up work.
- All historic Child Protection records are marked as such and kept securely locked away, and if these are stored electronically, that they are differently password protected from the child's other files, and accessible only by the Headteacher/DSLs.
- Child records are kept separately and marked as appropriate to indicate other confidential records are being held elsewhere.
- All absence letters are dated and signed, and that if there are concerns about attendance and a child's wellbeing and safety, the Education Welfare Officer is contacted.
- Phone calls about absences are similarly logged on the relevant MyConcern record the children who are absent from education- statutory guidance for local authorities is adhered to.
- Where a child is subject to a Child Protection Plan, and is absent without explanation, their key worker in Children's Social Care is contacted immediately, this should be recorded on MyConcern.
- Records are reviewed for patterns of what, when taking in isolation would appear to be low level concerns, but when viewed together indicate a pattern which requires further action.
- Where there are existing concerns about a child, and they transfer to another school, a copy of information held is transferred securely and confidentially. Where there are safeguarding records, there should also be a discussion with the receiving schools safeguarding team, and this should be recorded on MyConcern as an audit trail.
- Concerns are categorised in line with the Trusts MyConcern categories groupings.

### *All Staff*

All staff, teaching and non-teaching, volunteers and others working in our schools need to:

- Read, and sign to say that they have read Part one of KCSIE 2026 this is applicable to all staff and volunteers, including those who do not work directly with children.
- Be aware that to safeguard children, they have a duty to share information with the DSLs, and through the Lead DSL, with other agencies.
- Be aware that despite the requirement to share information with the safeguarding team they can make their own referral to children's Social Care, e.g., in urgent situations. All staff must be trained to make a referral.
- Will understand the processes within the Local Authority for community-based Family Help assessment. All staff should have knowledge of the criteria, including level of need, for when a case should be referred for family help support. For King Edward Primary School and Nursery this information can be found on NCC Community-based family support information page The family service | Nottinghamshire County Council
- All staff are to ensure that they have a clear understanding that disclosures may cover abuse, neglect, and exploitation. They should receive guidance on how to reassure victims that are being taken seriously and that they will be supported. KCSIE 2026, explains that "a victim should never be given the impression that they are

creating a problem by reporting abuse, sexual violence, or harassment. Nor should a victim every be made to feel ashamed for making a report" (P1:15)

- Be alert to signs and symptoms of harm and abuse. Further information regarding potential indicators of abuse, including specific information about risks such as Online safety, Female Genital Mutilation and Forced Marriage.
- Know how to respond to their duty when they have concerns or when a child discloses to them and to **act.**
- Know how to record concerns and what additional information may be required.
- Undergo child safeguarding training which is updated regularly in line with advice from the Trust, Local Authority, and other advisors. Guidance is available in both Keeping Children Safe in Education, 2026 and Working Together to Safeguard Children, March 2026.
- Recognise that abuse and neglect can happen in any setting and maintain an attitude *'it could happen here.'*
- Familiarise themselves with "What to do if you´re worried that at child is being abused: advice for practitioner's guidance" (2015).

Where there are concerns about the way that safeguarding is carried out in any school, staff should refer to the Trusts Confidential Reporting (Whistleblowing). 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 Home Office, the number is 0800 0280285, (08:00-20:00 Monday to Friday and 09:00-18:00 at weekends) or you can email them (help@nspcc.org.uk). If you believe a child is in immediate danger, call 999.

### Regulated Activity and Volunteers

**Regulated activity must be determined based on the role being undertaken, not the job title or volunteer status.** Schools must undertake a written assessment of all volunteer roles to determine whether the activity constitutes regulated activity and what safeguarding checks are required. This decision must be recorded and reviewed whenever the volunteer's role changes. Schools should retain evidence of this assessment and any associated risk assessment.

For the purposes of safeguarding, a volunteer may be engaging in regulated activity where they undertake teaching, training, instruction, care or supervision of children frequently, provide personal or intimate care, provide healthcare, or participate in relevant overnight activities. Schools must not assume that supervision alone removes a volunteer from regulated activity and must ensure that decisions are based on the current statutory definition and guidance.

Where a volunteer is assessed as undertaking regulated activity, the school must ensure that the appropriate safer recruitment checks have been completed, including an Enhanced DBS check with children's barred list information where required, and that these checks are accurately recorded on the Single Central Record.

Transform Trust expects Headteachers and DSLs to maintain clear oversight of volunteer arrangements. Schools must be able to demonstrate:

- how the regulated activity decision was reached;
- what safeguarding checks were completed;
- what supervision arrangements are in place (where applicable);
- who is responsible for overseeing the volunteer;
- that the volunteer has received safeguarding induction appropriate to their role.

Volunteers must never be deployed in a manner that bypasses safer recruitment requirements or substitutes for appropriate staffing arrangements. Any uncertainty regarding regulated activity status should be discussed with the Headteacher and the People Team or the safeguarding team before the volunteer commences the role. This reflects Transform Trust's expectation that safeguarding decisions are evidence-based, clearly documented and child-centred

***Visitors***

- Procedures for managing visitors are in place that put the safeguarding of children at the centre and is applied to **all** visitors irrespective of their status and frequency of visits. Staff should not shy away from questioning visitors, regardless of status if they feel that the correct processes have not been followed.
- All visitors to the school will be asked to bring formal identification with them at the time of their visit (unless they are named on the approved visitors/contractors list as set out below).
- Once on site, all visitors must report to reception first. No visitor is permitted to enter the school via any other entrance under any circumstances.
- At reception, all visitors must state the purpose of their visit and who has invited them. They should be ready to produce formal identification upon request.
- All visitors will be asked to sign into school either via an electronic sign in system or the Visitor's Record Book which is always kept in reception making note of their name, organisation, who they are visiting and car registration.
- All visitors will be required to wear an identification badge – the badge must remain visible throughout their visit.
- Visitors will then be escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site. The visitor must not be allowed to move about the site unaccompanied unless they are registered on the Approved Visitor List, the school must have completed and recorded the checks appropriate to the person's role, activity, frequency of attendance and supervision arrangements, in accordance with KCSIE and Transform Trust's safer recruitment procedures.

## Managing allegations of abuse made against teachers (including supply teachers), other staff, volunteers and contractors

Any concern about the conduct of an adult, including a concern that does not meet the harm threshold, must be shared without delay in accordance with the Trust's procedures for allegations and low-level concerns. Records must be factual, handled securely, and reviewed for patterns. Where information indicates that the harm threshold may be met, the appropriate Trust, LADO and local safeguarding procedures must be followed immediately.

**All** members of staff as well as volunteers in any of our schools should report any concerns that they have about the conduct of another adult in school. If they have concerns, they should **not** speak to the adult concerned but go straight to the Headteacher immediately. The concerns should not be discussed with anyone other than the Headteacher (including DSLs or other members of SLT). Headteachers must contact Rachel Hannon, Chief People Officer to outline the allegation and seek advice before acting or responding further.

Where an allegation is made against the Headteacher or equivalent, the Chief People Officer, Rachel Hannon, **must** be contacted immediately by the staff member who is raising the concern (contact details on page 3). The Chief People Officer will liaise with the Local Authority Designated Lead (LADO) and Chair of Governors. The concern must not be discussed with anyone other than Rachel Hannon in the first instance.

### What is a low-level concern

A concern about an adult's conduct that falls below our expected professional standards or Code of Conduct, however minor. Low-level concerns are shared, recorded and reviewed to help maintain a strong safeguarding culture, protect children and support professional accountability.

### Reporting Concerns to the Designated Safeguarding Leads

Any concern should be discussed in the first instance with *one of the DSLs or in their absence the Headteacher*, as soon as possible. **If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or the police immediately. Under Keeping Children Safe in Education guidance, it is made clear that all staff should know how to make a referral.** The National Police Chief Council (NPCC) have produced guidance of when to call the police, it also gives guidance of what you can expect to happen when you do make a report.

All concerns must be reported at the earliest opportunity. Staff should alert the DSL if information regarding a child is recorded on another system in the school so that it can be logged on MyConcern (e.g., persistent absence information held on Arbor. This helps the safeguarding team build a chronology of the lived life of the child/siblings'/ wider family and can be used to help inform referrals to professional services.

### *Immediate response to the child*

It is vital that our actions do not harm the child further or prejudice further enquiries, for example:

- Listen to the child, if you are shocked by what is being said, try not to show it.
- Record any bruises or marks you see, but not to ask a child to remove their clothing to observe them. Do NOT take photos of any injuries or marks – this is the role of the Police or Social Care if it is deemed necessary.
- If a disclosure is made:
  - accept what the child says.
  - stay calm, the pace should be dictated by the child without them being pressed for detail by asking leading questions such as "what did s/he do next?" It is your role to listen - not to investigate.
  - use open questions such as "is there anything else you want to tell me?"
  - be careful not to burden the child with guilt by asking questions like "why didn't you tell me before?".
  - acknowledge how hard it was for the child to tell you.
  - do not criticise the perpetrator, the child might have a relationship with them.
  - do not promise confidentiality, reassure the child that they have done the right thing, explain whom you will have to tell (the designated lead) and why; and, depending on the child's age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as "I'll stay with you all the time" or "it will be all right now".
  - all staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child.

### *Recording information*

- All concerns should be reported using MyConcern.

- All staff members have a secure password to access to MyConcern from any web enabled device that is linked using a school email address. Personal email addresses are **not** to be used.
- If the concern is urgent then this should be recorded promptly and flagged as urgent on MyConcern, as well as verbally informing your DSL.
- All concerns should be logged before you leave the premises on that day.
- All concerns should be categorised consistently with the agreed transform categories.
- For those staff members who do not have access to MyConcern a paper version of the form will always be available and must be completed and returned to the DSL as per the school policy (as above).
- Body maps should be used to record all injuries and marks – you should include what the mark is (i.e. bruise, graze, redness), the approximate size, the shape (i.e. circular mark, a line, zig zag) as well as colour (i.e. purple, red, yellowish). Staff must record only the observable features of the mark and must not attempt to determine its age or cause.
- Note the date, time, place and context of disclosure or concern, facts and not assumption, opinion or interpretation.
- **Do not take photographs under any circumstances. If you are requested to do so by social care or the police, please inform your DSL or Trust immediately and without actioning.**
- Note the non-verbal behaviour and the key words in the language used by the child (try not to translate into 'proper terms').

## Transform Trust Safeguarding Recording Standards - KCSIE 2026 Update

Safeguarding records must show the lived experience of the child, the action taken by adults, the rationale for decisions and the outcome for the child. Recording must be timely, factual and professionally curious.

• Concerns must not be closed in bulk. Each concern requires individual review and a recorded rationale before closure.

• DSLs should not close their own concerns unless they are the Lead DSL or Headteacher and this is appropriate within the school's safeguarding arrangements.

• All transferred safeguarding files added to MyConcern must include a note confirming that the file has been read and checked by a DSL, including the DSL's name and date.

• Staff must use factual and child-centred language. Avoid judgemental labels such as lied, liar, manipulative, attention seeking or naughty. Record what was seen, heard, said and done.

• Before a concern is closed, DSLs must consider whether there are linked concerns, patterns, attendance issues, SEND needs, sibling or family context, child voice, parent/carer contact, referral thresholds, and whether the child is safer because of the action taken.

• Where a child is absent from education or potentially missing education, schools must complete the appropriate local authority process for the authority in which the school is located and store evidence of the form and any response securely on MyConcern.

### *Supporting children*

- The staff, Transform Trust and Governors recognise that a child or young person who is abused or witnesses' violence may find it difficult to develop and maintain a sense of self-worth. We recognise that in these circumstances children might feel helpless and humiliated, and that they might feel self-blame.
- We recognise that this school might provide the only stability in the lives of children who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a child in these circumstances might range from that which is perceived to be normal to aggressive or withdrawn. We regularly update training and briefings to ensure all staff are as equipped to spot potential signs of abuse or neglects early as possible.
- The school will support all children's by discussing child protection cases with due regard to safeguarding the child and their family; supporting individuals who are, or are thought to be, in need or at risk in line with NCSCB

procedures; encouraging self-esteem and self-assertiveness; challenging and not condoning aggression, bullying or discriminatory behaviour; promoting a caring, safe and positive environment.

- We recognise that the provision of the right help at the right time is a key element of our wider safeguarding responsibilities.

### *Confidentiality*

- The personal information about the child's family is regarded by those who work in this school as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will adhere to the Data Protection policy and guidance.
- KCSIE 2026, makes it clear that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe (KCSIE P1:60).
- Staff understand that they need know only enough to prepare them to act with sensitivity to a child and to refer concerns appropriately. The DSL and Headteacher will disclose information about a child to other members of staff on a need-to-know basis only. It is inappropriate to provide all staff with detailed information about the child, incidents, the family, and the consequent actions.

### *Staff must be aware that:*

- They cannot promise a child complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other child's safe.
- Where there are concerns about a child's welfare relevant agencies need to be involved at an early stage. If a member of staff or a volunteer has concerns about a child's welfare, or if a child discloses that they are suffering abuse or reveals information that gives grounds for concern, the member of staff must speak to their Designated Lead with a view to passing on the information. All staff should ensure that they are familiar with the list in KCSIE P1:13 which outlines who may need family (early) help.

### *Working with Parents/Carers*

- Parents and Carers play an important role in protecting their children from harm.
- In most cases, the school will discuss concerns about a child with the family and, where appropriate, seek their agreement to making referrals to Children and Families Services within their Local Authority setting.
- Where there are any doubts, the DSL should clarify with Children and Families Direct on whether, and if so when and by whom, the parents should be told about the referral. Alternatively, they could ring the Consultation Line in Children's Duty team to discuss this case.
- The child's views will be considered in deciding whether to inform the family, particularly where the child is sufficiently mature to make informed judgments about the issues, and about consenting to that.
- The school aims to help parents understand that the school, like all others, has a duty to safeguard and promote the welfare of all children. The school may need to share information and work in partnership with other agencies when there are concerns about a child's welfare.

### *The Child's wishes*

"Where there are a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report, any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback" (KCSIE, P1:118 & 119).

### *Looked After Children (also to be referred as Children in Care)*

Supporting children in care is a key priority for our school. We recognise that the needs of this group of children can only be effectively met when all agencies work together. To ensure we have a coordinated approach to meeting

the needs of children in care who attend our school we have a designated lead. KEPS Designated Looked After Teacher is Amy Binks.

### *Prevention in the Curriculum*

- The school recognises the importance of developing children's awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The PSHE programme *in each key stage* provides personal development opportunities for children to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, children are taught, for example:
  - To safely explore their own and others' attitudes.
  - To recognise and manage risks in different situations and how to behave responsibly.
  - To judge what kind of physical contact is acceptable and unacceptable.
  - To recognise when pressure from others (including people they know) threatens their:
  - personal safety and well-being and develop effective ways of resisting pressure. including knowing when and where to get help
  - How to use assertiveness techniques to resist unhelpful pressure.
  - How to keep safe online both in school and outside.
  - The risks associated with sharing indecent images of, or information about, themselves. This is something that is often referred to as making or sharing nudes or semi nudes (previously referred to as sexting). Research indicates that this is increasingly associated with concerns such as sexual exploitation. Our work in this area is based on the guidance set out in Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People.
- School staff should be aware of the school's position statement on sexting (also referred to as Youth Produced Imagery). This includes sharing of nudes or semi-nudes.

### Generative Artificial Intelligence (AI)

Generative AI tools are now widespread and easy to access. Staff, children and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Transform Trust and KEPS recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard children. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose children to harmful content. For example, in the form of 'deepfakes' where AI is used to create images, audio or video hoaxes that look real.

KEPS will treat any use of AI to access harmful content or to bully children in line with this policy and our anti-bullying and behaviour policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

### Generative AI, Deepfakes and Emerging Online Risks

Schools should recognise that generative AI may increase existing safeguarding risks, including bullying, grooming, impersonation, coercion, harmful image generation, misinformation, and the creation or sharing of realistic audio, images or video that appear to show real people.

• Staff should report any concern involving AI-generated or AI-enabled harmful content to the DSL immediately and record it on MyConcern.

• Schools should teach children, in an age-appropriate way, that AI-generated content may not be real and that creating, requesting or sharing harmful content about another person is a safeguarding and behaviour concern.
• Any school use of AI tools must be risk assessed before implementation, including consideration of data protection, age appropriateness, staff oversight and how concerns will be escalated.

### Online/E-safety

The recent introduction of the Online Safety Act 2023 provides for a regulatory framework which has the general purpose of making the use of internet services regulated by this Act safer for individuals in the UK. The purpose of the Act is to:

- impose duties which, in board terms, require providers of services regulated by this Act to identify, mitigate and manage the risks of harm (including risks which particularly affect individuals with a certain characteristic) from:
    - illegal content and activity, and
    - content and activity that is harmful to children, and
- confers functions and power on the regulator, OFCOM.

Duties imposed on providers by this Act seek to secure (among other things) that services regulated by this Act are:
a. safe by design, and
b. designed and operated in such a way that:
    i. a higher standard of protection is provided for children than for adults,
    ii. users' rights to freedom of expression and privacy are protected, and
    iii. transparency and accountability are provided in relation to those services.

We expect our schools to give due regard to this Act and alert any provider of any harmful content immediately and where appropriate alert the regulator.

Online/E-safety is covered across the curriculum at KEPS The Digital Lead, Tom Daykin can provide more information about how we educate our children to be safe online and when different themes are taught.

All Transform Trust schools have Smoothwall installed as part of their filtering system. This will block any inappropriate searches, such as those relating to self-harm, social media and adult content. In addition to Smoothwall all school child iPads have LightSpeed installed on them. This is a real time monitoring background application which can alert the DSLs in school as well as the Central Team, if a child has been trying to access inappropriate or harmful content (even though the content will be blocked). The high-level data is then reported to Governors and Trustees.

In response to several extremely worrying hoaxes and online challenges there has been additional guidance published which can be found here.

Every opportunity should be taken to promote online safety with our children. The online world means that we all have access to material and people that we may not come across in everyday life. KCSIE P2:162-163 includes details for online safety and outlines the four main risks: -

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, succedent-Semitism, radicalisation and extremism.

- **Contact:** being subjected to harmful online interaction with other users; for example: peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your child's, students or staff are at risk, please report it to the Anti-Phishing Working Group(https://apwg.org/).

### Filtering and Monitoring

We work closely with our IT provider and the Director of Facilities to ensure that the Trust have robust systems in place for filtering and monitoring. We regularly (at least once a term) review and test our filtering restrictions to ensure we are capturing any latest trends or terminology but also so that we ensure we are not restricting the searches that are age appropriate and needed for the curriculum.

Governors are provided with data at each Governors meeting and the Trust have oversight of the system so we can monitor for trends or changes that are needed.

When there are monitoring alerts, children are spoken to from the lens of online safety first and any behaviour concerns second. We firstly want to know why they have searched for something that has alerted and will educate around this.

### Remote Learning

In exceptional circumstances it may be necessary to provide remote learning to a child. There are very clear guidelines set out in the DfE document, Providing remote education (January 2023). Although this is not a statutory guidance document, Transform Trust does expect schools to follow this guidance when considering remote education. When a need for remote education has been identified this should be discussed with Kelly Lee, Chief School Improvement Officer, to ensure that it complies with the school improvement expectations.

In addition to the guidance above, the Trust also expects schools to carefully consider the safeguarding implications of a child not being in school. There is DfE guidance and in addition to this, we expect a plan of how the child will be 'visible' during the period that they are not in school.

### Mental Health

Schools have an important role to play in supporting the mental health and wellbeing of our children. In some cases, mental health concerns can be an indicator that the child has or is at risk of suffering some form of abuse, neglect or exploitation. Schools should be familiar with the guidance document Mental Health and Behaviour in schools (2018).
https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, school staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff need to be aware of how past experiences can impact on mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSLs.

## Definitions, Signs and Symptoms of the four kinds of Abuse and Neglect

**Abuse,** including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. Abuse is a form of maltreatment of a child. Somebody may abuse of neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them, or rarely, by others.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
(See appendix 2 for signs and symptoms of physical abuse)

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

**Emotional abuse** may involve:

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

(See Appendix 3 for signs and symptoms of emotional abuse).

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

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

(See Appendix 4 for signs and symptoms of sexual abuse).

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. It can be difficult to know when to take action to protect a child from neglect, ensure that staff know who they can approach to voice their concerns and discuss next steps.

One off sign may not mean that a child is being neglected. Knowing when a child or family need help requires someone to recognise that there are ongoing or persistent patterns of neglect.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be standalone or part of a broader pattern of abuse. Causing someone to engage in sexual activity without consent, such as forcing someone to remove their clothes, touch themselves sexually or to engage in sexual activity with a third party.
- Consensual and non-consensual images (also known as youth produced sexual imagery or previously sexting).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they should follow the standard reporting procedures, speaking to a DSL and adding to MyConcern.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

### Misogyny and Misandry

Transform Trust and its schools recognise misogyny (prejudice, discrimination or harmful attitudes towards women and girls), misandry (prejudice, discrimination or harmful attitudes towards men and boys) and other forms of prejudice-based abuse as safeguarding concerns where they contribute to harassment, discrimination, child-on-child abuse, sexual violence, sexual harassment or a culture that normalises abuse

All staff are expected to challenge such behaviour appropriately, report safeguarding concerns, and support pupils to develop respectful attitudes and healthy relationships. The school will address these issues through its safeguarding arrangements, behaviour policy, curriculum, online safety education and pastoral support, recognising that early intervention can help prevent the escalation of harmful attitudes and behaviours.

### Particularly Vulnerable Groups

Some children and young people may be particularly vulnerable to abuse and harm, which is documented in Section 35 of the Safeguarding Vulnerable Groups Act 2006. This includes for example privately fostered children, children with a disability, children with communication needs. Certain forms of behaviour can also increase the vulnerability of a young person such as drug or alcohol misuse. The DSLs should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local NCC procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm.

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. CSE and CCE 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.

### Child Sexual Exploitation

The sexual exploitation of children and young people (CSE) under 18 is defined as that which:
*'Involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) because of them performing, and/or another or others performing on them, sexual activities."*

Child sexual exploitation can occur using technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability' (Department for Education, 2012).

Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.

### Who is at risk?

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face, and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child safeguarding issue. of KCSIE 2026, P1:34-42 which gives further guidance.

### Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity for:

- in exchange for something the victim needs or wants, and/ or

- for the financial or other advantage of the perpetrator or facilitator and/or
- through violence or the threat of violence.

Data shows children as young as 8 can become victims of CCE; however, staff should be vigilant for all children and families regardless of age.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals. They may still have been criminally exploited even if the activity appears to be something they have agreed to or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that boys and girls being criminally exploited may be at higher risk of sexual exploitation. KCSIE 2026 Annex A pg162-164

### County Lines

Criminal Exploitation of children and vulnerable adults: County Lines guidance KCSIE 2026 (Annex A pg157-158) documents how children can be at risk of exploitation in a geographically widespread form of abuse relating to drug and gang cultures. Children are moved around the area and in some cases across the country to carry drugs, money and other illegal activities. Further information is available in the document produced by the Home Office - Criminal Exploitation of children and vulnerable adults: County Lines guidance.

### Awareness of Modern slavery and the National Referral Mechanism

As outlined in KCSIE P5:pg166, staff have an awareness of modern slavery and what this could look like in our school communities. Any concerns that our families or staff may be subject to financial exploitation, human trafficking, slavery, servitude and forced or compulsory labour should be raised with the Lead DSL for the school or Headteacher if it relates to a member of staff. Additional information can be found here .

Further information on the support that is available can be found here

### Preventing Radicalisation

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counterterrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of, becoming radicalised. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk, and that staff are appropriately trained to look out for signs of radicalisation. Also, schools will be monitored to ensure they are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programs to challenge extremist ideology.

Statutory guidance has been published and is available here:
https://www.gov.uk/government/publications/prevent-duty-guidance

If you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact at your regional police Prevent Team who will then contact you to discuss whether a referral should be made. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Staff will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force.

Staff will ensure that suitable internet filtering is in place and equip our children to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alerted to changes in children's' behaviour.
The government website Educate Against Hate and charity NSPCC say that signs that a child is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
Staff should **always** act if they are worried. All staff are responsible as individuals to report any concerns.

### Honour-Based Violence (HBV)

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse and illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency. The school should also notify the Director of Safeguarding & Data Protection.

### Female Genital Mutilation

Female genital mutilation (FGM) 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; however, it is believed that most cases happen between the ages of 5 and 8.

**Risk factors of FGM**

- 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.

**Symptoms of FGM**

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-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Potential indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Whilst all staff should speak to the designated safeguarding lead (or deputy) about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. (KCSIE 2026 – Annex A pg171). The school should also notify the Director of Safeguarding & Data Protection **immediately.**

### FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary

sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining children or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. FGM Fact Sheet. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty:
Further information can be found in the multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.
(See Appendix 5 which identifies countries that practice FGM).

### Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (section 8 focusses on the role of schools and colleges). There is also additional information available at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### Domestic Abuse

KCSIE 2026 Annex A pg161-164 has been updated with information around domestic abuse and the impact that can have on how children form relationships: -

*Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn*

### Operation Encompass

Operation Encompass operates in all Police forces across England. Nottinghamshire Police are required to inform the school (via an email) if they have been called to a domestic abuse incident where there are children in the household. This is in addition to the Police and schools' statutory duty to report to Social Care, but the alert should allow a DSL to check that a child is in school and ensure immediate support is put in place according to the child's needs.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. Information can be found here

### Children who are absent from education (children missing from education)

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children absent from education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so- called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children absent from education procedures.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. The Trust Attendance policy outlines the process to follow if a child is missing from education and this should be recorded on MyConcern.

### 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. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; 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.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no

duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### Kinship Care

The Government announced the Championing Kinship Care – The National Kinship Care Strategy in December 2023. It outlines the plan to formalise support and funding for Kinship carers. Where we have Kinship Carers, we will support schools to ensure that the appropriate support is provided.

### Young Carers

Young carers are defined as anyone under the age of 18, who help to look after a relative with a disability, illness, mental health condition or someone who has a drug or alcohol problem. This also includes supporting siblings. If you identify children as Young Carers this needs to be recorded on MyConcern. The Trust will support schools to ensure the children and families are supported. The Local Authority also offer support and guidance.

### Sexual Violence/Sexual Harassment (SVSH)

Part 5 of KCSIE 2026 (pg123-154) documents how schools should manage reports of sexual violence and sexual harassment. The schools safeguarding policy should document how staff should manage allegations and how they should put measures in place to safeguard the child who was harmed (victim) and child who has displayed harmful behaviours (alleged perpetrator).

All staff must be trained to deal with these allegations and how to make a referral to the relevant authorities such as the police. There is additional guidance available for allegations about online abuse at https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

KCSIE is very clear that any allegation regarding sexual violence and/or sexual harassment is not acceptable and will not be tolerated. Allegations should not be passed off by any party as “banter” “Part of growing up” or “having a laugh”.

### Sexual harassment

Staff should be aware that safeguarding issues can manifest themselves via abuse. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of abuse. Even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. Any concerns regarding abuse should be reported to the DSLs as a matter of urgency.

Sexual harassment might include, but not limited to: -

- Sexual comments, such as telling sexual stories, making inappropriate comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual jokes or taunting.
- Physical behaviour, such as, deliberately brushing against someone, interfering with someone’s clothes. Sexual violence to another child.

- Displaying pictures, photos or drawings of a sexual nature.
- Upskirting (this is a criminal offence).
- Online harassment. This may be standalone or part of a wider pattern of sexualised harassment and/or sexualised violence.
- Sharing of consensual and non-consensual nude and semi-nude images, including photos of the child taken by themselves.
- Coercing children to share images of themselves or others.

Different gender issues can be prevalent when dealing with abuse. All staff should be clear in their role and the important part they have in preventing it by responding where they believe a child may be at risk from abuse.

At Transform Trust we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.

We recognise that some children will sometimes negatively affect the learning and wellbeing of others, and their behaviour will be dealt with under the school's Behaviour Policy (which includes cyberbullying, prejudice-based and discriminatory bullying).

At Transform Trust schools we work with agencies such as the police and social care to support anyone affected by abuse.

### *Consensual and non-consensual making or sharing of nudes and semi-nudes*

consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI[45]. The policy should include the school or college's approach to it. The department provides Searching Screening and Confiscation Advice for schools. The UKCIS Education Group has published Sharing nudes and semi-nudes: advice for education settings working with children.

### *Upskirting*

The Voyeurism (Offences) Act, often referred to as Upskirting Act was introduced on 19th April 2019. Upskirting is defined by KCSIE, 2023 is "typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm." Upskirting is illegal, and the perpetrator can face up to 2 years in prison. **The victim can be any gender.** Since KCSIE 2023 the guidance has been updated to ensure although referred to as upskirting, the victim can be any gender.

### Mobile Devices

Appropriate use of mobile devices is essential. The use of mobile devices must not detract from the quality of supervision and care of children. Practitioners can use their personal mobile phones during their break times. During working hours, they must be kept out of the reach of children and parents, in a secure area accessible only to staff. All staff are made aware of their duty to follow this procedure which is set out in the Code of Conduct.

Visitors to schools are requested not to use their mobile phones (or other personal devices) on the premises. If it is needed a member of school staff will show them where it can be used away from children.

We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration. We take a mixture of photos that reflect the pre-school environment; sometimes this will be when children are engrossed in an activity either on their own or with their peers. Children are encouraged to use the camera to take photos of their peers. To safeguard children and adults, and to maintain

privacy, cameras are not to be taken into the toilets by adults or children. All adults whether teachers/practitioners or volunteers at KEPS understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act.

### Children who Self-harm

Staff should always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse. All such cases should be discussed with children's social care.

Even in those unusual cases where a primary age child is thought to have self-harmed it is important to recognise that this behaviour is an indicator of emotional distress, and the child will need support to address this.

### The Children's Code

The Children's Code came into effect on 2 September 2021. This is a data protection code of practice for online services such as apps, online games, web and social media sites likely to be accessed by children. Schools and DSLs need to ensure that any online services commissioned are compliant with the 15 standards in which to protect children's data online. More information and teaching resources are available: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/introduction-to-the-childrens-code/

### Children with Special Educational Needs and Disabilities (SEND)

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- children with SEND and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

### Safeguarding Training

Regular training and discussion within the school environment is important and should be led by the Lead DSL. The Trust additionally provides opportunities for DSLs to network and share best practice with their peers across the Trust through mini-case conferences. Staff training will include reference to filtering and monitoring so that staff understand and have an awareness of this.

### *Timelines for training*

All safeguarding training should be refreshed within the required timeline issued by the Trust.

All staff, schools and Governing bodies should be open to new learning and keep up to date with changes made to national and local safeguarding policy, procedure and guidance including that provided by our safeguarding partners.

Schools need to evaluate and demonstrate how well they fulfil their statutory responsibilities and exercise professional judgments as outlined in KCSIE 2026.

Safeguarding training records should be made available for viewing by the Trust Safeguarding Team and the Safeguarding Governor upon request.

## Schools and Partnerships

Schools invest time and other resources in partnership activity, and this investment should be aimed at improving outcomes for children. The Local Authority actively promotes the benefits to schools of partnerships and in this case to safeguard and improve the outcomes for potentially vulnerable children. Examples of this are:

***Parenting support***

https://www.nspcc.org.uk/keeping-children-safe/support-for-parents/?gclsrc=aw.ds&gad_source=1&gad_campaignid=22744845528&gbraid=0AAAAAD1QhMruNuCIrF1q_i5UvHzZFW7d3&gclid=EAIaIQobChMIiuL-2oqojwMVyZFQBh0UACXPEAAYASAAEgJWAvD_BwE

https://www.childline.org.uk/get-support/ask-sam/

***Links for documents referred to in this policy***

| | |
|---|---|
| *Keeping children safe in education 2026* | *https://assets.publishing.service.gov.uk/media/6a4cf903b7203c4c023fd2f3/Keeping_children_safe_in_education_2026_.pdf* |
| *Working Together to safeguard children (March 2026)* | *https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf* |
| *Alternative Provision National Guidance* | *https://www.gov.uk/government/publications/alternative-provision* |
| *The children's code* | https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/childrens-information/childrens-code-guidance-and-resources/introduction-to-the-childrens-code/ |
| *FGM* | ***Fact sheet***<br>*https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf*<br><br>***Mandatory Reporting***<br>*Mandatory reporting of female genital mutilation procedural information.* |
| *Modern Slavery training: resources page- GOV.UK* | *https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page#aim* |
| *Modern slavery: how to identify and support victims – GOV.UK* | *https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims* |
| *NSCPCC – Worried about safeguarding in your workplace (whistleblowing)* | *https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/* |
| *Operation Encompass Teacher advice line* | *https://www.operationencompass.org/SM4/Mutable/Uploads/medialibrary/Help-and-Advice-Line-2022.pdf-2.pdf* |
| *Prevent duty* | https://www.gov.uk/government/publications/prevent-duty-guidance |

| | |
|---|---|
| *When to call the police* | *https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf* |

## Appendix 1: Transform Trust Safeguarding Support and Intervention

# Transform Trust Safeguarding Support & Intervention

**UNIVERSAL**

### Safeguarding & Inclusion Strategic Implementation Cycle (SISIC)

An annual development cycle focused on safeguarding and inclusion, evaluating practice, identifying strengths and agreeing improvement priorities.

**Who:** All schools

**When:** Annual

**Purpose:** To provide strategic assurance that safeguarding and inclusion remain effective, compliant and centred on children's lived experiences.

**UNIVERSAL**

### Reflective Practice Partnership Group

Safeguarding professionals work collaboratively to explore complex cases, themes and practice issues through structured peer challenge and reflection.

**Who:** All schools, in Partnership Groups

**When:** When requested

**Purpose:** To strengthen professional curiosity, share effective practice and improve decision-making across Trust schools.

**BESPOKE**

### Trust Child Watch Meetings

Multi-disciplinary review of children presenting the highest levels of vulnerability or complexity across the Trust.

**Who:** Chaired by Claire McKendrick, members Mary Farmer, Emma Hampton, Jo Jeffs and Kelly Lee

**When:** Half-termly

**Purpose:** To provide oversight, challenge and support where a child presents with multiple risk factors, including attendance, safeguarding concerns, suspensions or unmet need.

**INTERVENTION**

### Trust Serious Case Panel

Convened following a child death or serious incident where statutory safeguarding review processes are initiated.

**Who:** A Trust Serious Case Panel runs parallel with the Local Authorities Rapid Review/ Serious Case Review.

**When:** As needed

**Purpose:** To undertake a Trust review of practice, identify learning, support the school and ensure improvements are embedded across the Trust.

**INTERVENTION**

### 'No Notice' Visit

Unannounced safeguarding review commissioned following a significant concern, serious incident or at the request of the Executive Team or Trust Board.

**Who:** Claire McKendrick (The visit may also include an independent safeguarding colleague identified by the Trust.)

**When:** As deemed appropriate by the Exec Team or the Director of Safeguarding & Data Protection.

**Purpose:** To test the effectiveness of safeguarding arrangements, review actions taken and provide immediate support and challenge where required.

**INTERVENTION**

### Trust Case Conference

Convened where there are concerns regarding safeguarding practice, decision-making or case management.

**Who:** Kelly Lee, Rebecca Meredith & Claire McKendrick

**When:** As needed

**Purpose:** To ensure robust safeguarding practice, provide challenge and agree actions necessary to safeguard children effectively.

**The categories illustrate increasing levels of Trust oversight, challenge and intervention. Schools may move between categories depending on the nature of concerns, risk and support required.**

## Appendix 2: Signs and Symptoms of Physical Abuse

**Physical symptoms:**

Bruises

- commonly on the head but also on the ear or neck or soft areas - the abdomen, back and buttocks
- defensive wounds commonly on the forearm, upper arm, back of the leg, hands or feet
- clusters of bruises on the upper arm, outside of the thigh or on the body
- bruises with dots of blood under the skin
- a bruised scalp and swollen eyes from hair being pulled violently
- bruises in the shape of a hand or object.

Burns or scalds

- can be from hot liquids, hot objects, flames, chemicals or electricity
- on the hands, back, shoulders or buttocks; scalds may be on lower limbs, both arms and/or both legs
- a clear edge to the burn or scald
- sometimes in the shape or an implement for example, a circular cigarette burn
- multiple burns or scalds.

Bite marks

- usually oval or circular in shape
- visible wounds, indentations or bruising from individual teeth.

Fractures or broken bones

- fractures to the ribs or the leg bones in babies
- multiple fractures or breaks at different stages of healing

Other injuries and health problems

- scarring
- effects of poisoning such as vomiting, drowsiness or seizures
- respiratory problems from drowning, suffocation or poisoning

Things you may notice

Withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide.

Body Maps must be completed on MyConcern when reporting any kind of mark or injury.

## Appendix 3: Signs and Symptoms of Emotional Abuse

There often aren't any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions.

Changes in emotions are a normal part of growing up, so it can be difficult to tell if a child is being emotionally abused.

Babies and pre-school children who are being emotionally abused or neglected may:

- be overly affectionate towards strangers or people they haven't known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g., when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect them to know for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends.

Things you may notice

Withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide

## Appendix 4: Signs and Symptoms of Sexual Abuse

Children who are sexually abused may:

**Stay away from certain people**

- they might avoid being alone with people, such as family members or friends
- they could seem frightened of a person or reluctant to socialise with them.

**Show sexual behaviour that's inappropriate for their age**

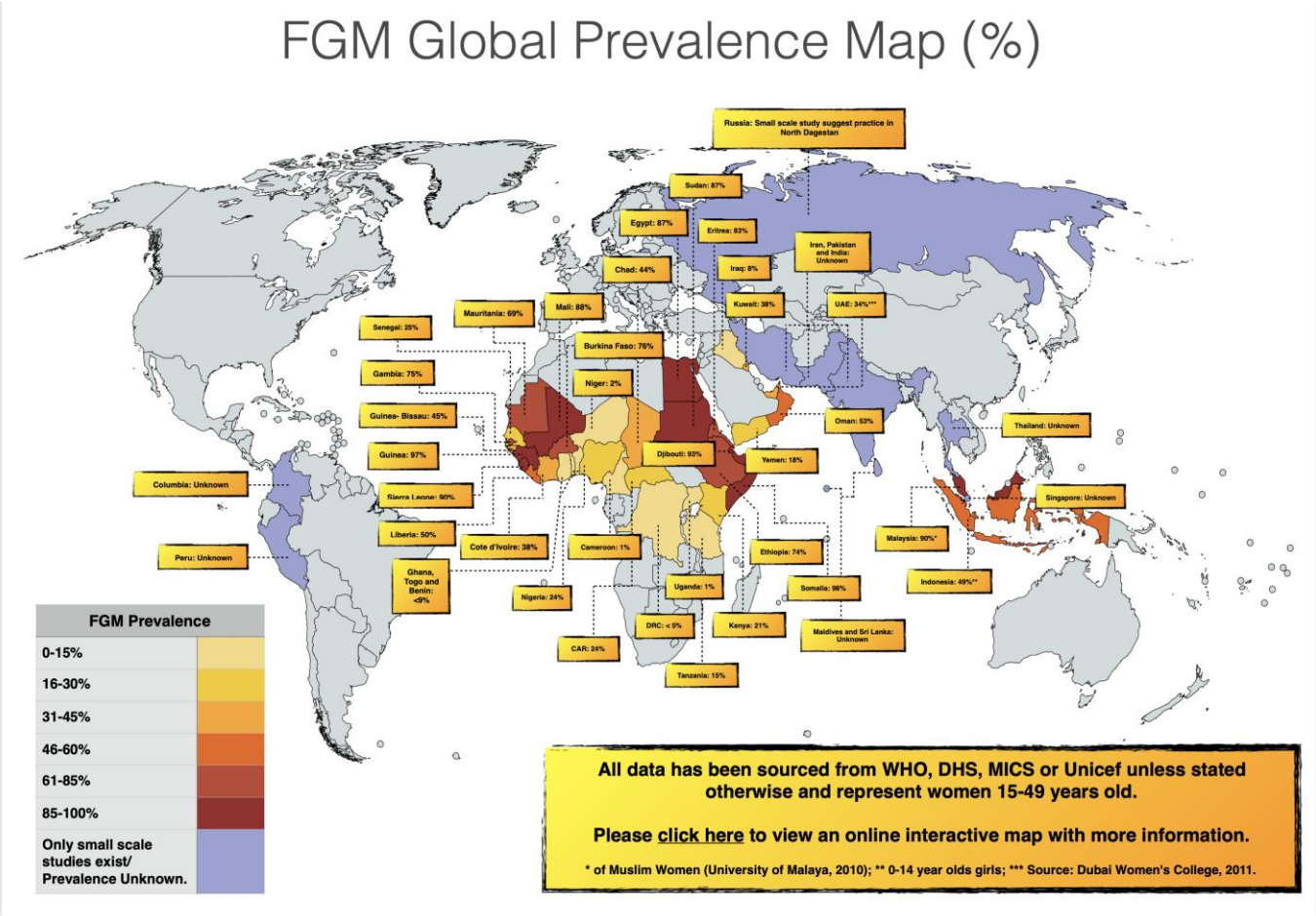
- a child might become sexually active at a young age
- they might be promiscuous
- they could use sexual language or know information that you wouldn't expect them to.

**Have physical symptoms**

- anal or vaginal soreness
- an unusual discharge
- sexually transmitted infection (STI)
- pregnancy.

Things you may notice

Withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide.

## Appendix 5: Countries that practice FGM

**Link to interactive map https://nationalfgmcentre.org.uk/world-fgm-prevalence-map/**