



Policy name	Safeguarding Policy & Children Protection Procedures
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Penrose Learning Trust comprises of:

Claydon High School
Colchester Academy
Dale Hall Community Primary School
East Bergholt High School
Hadleigh High School
Claydon Primary School
Elmstead Primary School
Frinton-on-Sea Primary School
Great Bentley Primary School

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KEY CONTACTS WITHIN EACH SCHOOL/TRUST

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Trust Designated Safeguarding Lead

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NAME Beth Wheatley
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DESIGNATED SAFEGUARDING & CHILD PROTECTION LEAD at DALE HALL COMMUNITY PRIMARY SCHOOL

NAME Jade Nixon
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DESIGNATED SAFEGUARDING & CHILD PROTECTION LEAD at EAST BERGHOLT HIGH SCHOOL

NAME Robert Herbert
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DESIGNATED SAFEGUARDING & CHILD PROTECTION LEAD at HADLEIGH HIGH SCHOOL

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DESIGNATED SAFEGUARDING & CHILD PROTECTION LEAD at ELMSTEAD PRIMARY SCHOOL

NAME Ian MacDonald
CONTACT safeguarding@elmstead.essex.sch.uk 01206 822889

DESIGNATED SAFEGUARDING & CHILD PROTECTION LEAD at FRINTON-ON-SEA PRIMARY SCHOOL

NAME Laurie Chapman
CONTACT safeguarding@frintononsea.essex.sch.uk 01255 674007

DESIGNATED SAFEGUARDING & CHILD PROTECTION LEAD at GREAT BENTLEY PRIMARY SCHOOL

NAME Daniel Wilkinson
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All safeguarding concerns must be added to MyConcern, even if an email is sent

Key numbers for referrals

If you are concerned a child is subject to, or at risk of, being harmed or neglected, you should take action, as set out below, considering the home address of the young person/family. To check a local authority, postcodes of the home address can be checked here:

<https://www.gov.uk/find-local-council>

In Suffolk

Suffolk MASH Professional Consultation Line for advice – 0345 606 1499 or Customer First 0808 800 4005 for referrals

<https://suffolksp.org.uk/>

In Essex

Essex Safeguarding Consultation Line – 0345 603 7627 or 0345 606 1212 (out of hours)

Ask for Priority (Level 4) or Consultation (Level 2,3,4)

[Concerns about the welfare of a child](#)

❖ Immediate Risk of Significant Harm - Priority

Where a child is at immediate risk of significant harm, please call the Children & Families Hub on 0345 603 7627 and ask for the 'Priority Line', and/or call the Police on 999.

During out of hours (Monday to Thursday 5pm to 8.45am, Friday and Bank Holidays 4:15pm to 8.45am), please call: 0345 606 1212 or email: Emergency.DutyTeamOutOfHours@essex.gov.uk or Suffolk MASH Professional Consultation Line for advice - 0345 606 1499 or Customer First 0808 800 4005 for referrals

❖ Request for Support

If you are concerned that a child or young person is being harmed or neglected, or is at risk of this, you should go to the [Essex County Council](#) or Suffolk <https://suffolksp.org.uk/> website where you can make a request for support to the Children & Families Hub.

❖ Consultation

The Children and Families Hub offer a consultation line for professionals providing advice and guidance. This can be accessed by calling 0345 603 7627 and asking for the 'Consultation Line'. You can also seek advice on Early Help at the online weekly 'drop-ins' - more information is available on this [link](#).

❖ Request for Information Portal

Enquiries and requests for information from the Children and Families can be made through this [online form](#).

❖ Useful Resources

The [Essex County Council](#) website includes the [Essex Directory of Services](#) and other guidance and tools to support practitioners in their work with children and families across Levels 1, 2, 3 and 4 of the Windscreen of Need (Appendix 2) or Suffolk <https://suffolksp.org.uk/>

Radicalisation

If there are concerns someone is vulnerable to radicalisation, or there is a concern about organisations that work with children:

If you have a concern that a crime is being committed, planned, or you are aware of any terrorist activity, please contact the police on either 999 (if urgent) or 101 (for all other enquiries). Reports of possible terrorist activity can be made via [Action Counters Terrorism \(ACT\)](#).

Prevent is a national programme that aims to stop people from becoming terrorists or supporting terrorism. It works to ensure that people who are susceptible to radicalisation are offered appropriate interventions, and communities are protected against radicalising influences. For learners who may be susceptible to radicalisation into terrorism, it is recommended that advice is sought before a referral is made. Staff in our schools should speak to the DSL in the first instance, who can then seek advice if required through the Police Prevent team: prevent@essex.police.uk 01245 452196 (Eastern Region) or through the Education Safeguarding Team: EducationSafeguarding@essex.gov.uk. In Suffolk - <https://suffolksp.org.uk/>

If it is felt a referral is needed to Prevent, the online form, and Essex advice documentation, can be found here: [National Prevent referral form](#), and further advice can be found [here from the DfE](#) and [on this guidance from the Home Office](#).

If there are wider safeguarding concerns, a call should be made to the Children and Families Hub/ Social Care to consider whether other support and action is also necessary.

Domestic Abuse - Operation Encompass

Our schools are signed up to Operation Encompass to receive notifications. Operation Encompass aims to reduce the long-term impacts of domestic abuse by providing early intervention and support. When the police attend incidents of domestic violence or abuse where children are directly or indirectly involved, they notify the designated safeguarding lead at the child's school before the start of the next school day. The safeguarding lead then makes sure the child gets the immediate support that they need.

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. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its [website](#) provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. In Essex, [COMPASS](#) also list local agencies who can support; their helpline is 0330 333 7444. In Suffolk - Suffolk Domestic Abuse Service (SDAS): info@suffolkdv.org.uk | 0800 0852 361 (24h)

1. Introduction

Schools and colleges and their staff are an important part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child. (*Keeping Children Safe in Education - DfE, 2026*).

Please note that any reference to school/schools also includes and apply to the full range of school activities, with adjustments made as necessary through additional documentation e.g. trips and work placements.

This child protection and safeguarding policy applies to all staff, Governors, Trustees, Members, volunteers, and contractors, and the wider school community of all Penrose Learning Trust schools. It forms part of the safeguarding arrangements for our schools, and so the processes outlined in this policy should be followed by all; it should be read in conjunction with the following:

- Keeping Children Safe in Education - namely parts 1 and Annex A (further information)- (DfE, 2026);
- the school behaviour policy (including the approach to mobile phones);
- the Trust's Code of Conduct for staff;
- the safeguarding response to children missing from education (Appendix 5 and associated links)
- health and safety policy
- anti-bullying policy
- safer recruitment policy
- restrictive interventions policy

The child protection policy will:

- Explain the role and identity of the Designated Safeguarding Lead (DSL) and any deputies;
- Explain reporting procedures and systems which are in line with government guidance;
- Refer to local agreed multi-agency safeguarding arrangements;
- Cover specific safeguarding issues that all staff need to be aware of (as outlined in KCSIE 2026);
- Outline the safeguarding response to children missing from education.

We are also aware of our obligations under the Human Rights Act 1998 and the Equality Act 2010, (including the Public Sector Equality Duty).

This policy is available on the school's website for all parents/carers to ensure they are aware of our procedures, and how to seek support should it be required.

Safeguarding and promoting the welfare of children (*everyone under the age of 18*) is defined in Keeping Children Safe in Education 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 and physical health or development;

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

2. Safeguarding in Penrose Learning Trust

Penrose Learning Trust takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care. “The welfare of the child is paramount” (Children Act 1989).

Our approach to safeguarding and welfare includes:

- Prevention** through the creation of a positive school atmosphere and the teaching, and pastoral support offered to students;
- Protection** by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to child protection concerns;
- Support** for students who may have been abused.

The schools recognise that they are an agent of referral and not of investigation.

We recognise that for our students, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult help to prevent abuse. Our schools will therefore:

- Establish and maintain an environment where students feel safe and secure, are encouraged to talk and are listened to;
- Provide reporting mechanisms to support all pupils/students, allowing them to report concerns in a way that they feel comfortable. We will seek to gain student voice on a regular basis to review this;
- Ensure that students know that there are adults within the school they can approach if they are worried or are in difficulty;
- Ensure students receive the right help at the right time to address risks and prevent issues escalating;
- Include in the curriculum activities and opportunities which equip students with the knowledge and skills they need to stay safe from abuse and to develop healthy and safe relationships;
- Protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values and to promote respect for all others;
- Facilitate understanding of wider issues within the context of learning about the values on which our society is founded, and our system of democratic government;
- Provide a curriculum which actively promotes the fundamental British Values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs;
- Promote tolerance of and respect for people of with protected characteristics, including all faiths (or those of no faith), races, genders, ages, disability, and sexual orientations;
- Make parents/carers aware of the school policies and practice for safeguarding and ensure that, wherever possible, every effort will be made to establish open and honest effective working relationships with parents/carers, and colleagues from partner agencies.

Family (Early) Help

Whilst many of the procedures will outline our approach to Child Protection, Family (Early) Help is a key part of our approach to safeguarding, ensuring children and families get the right help at the right time. Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

All school staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer (or may be previously unidentified as a young carer)
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

3. Statutory framework

There is Government guidance set out in [Working Together \(DfE March 2026\)](#) on how agencies must work in partnership to keep children safe. This guidance places a shared and equal duty on three Safeguarding Partners (the Local Authority, Police, and Health) to work together to safeguard and promote the welfare of all children in their area under multi-agency safeguarding arrangements. These arrangements sit under the [Essex Safeguarding Children Board](#) (ESCB). In Suffolk - <https://suffolksp.org.uk/>.

Where applicable, our schools work within the Early years foundation stage (EYFS) statutory framework for children aged 0 to 5 in school-based nurseries and reception (namely section 3).

In Essex, where some of our schools are located, the statutory partners are Essex County Council, Essex Police and Essex Integrated Care Board. The development of appropriate procedures and the monitoring of good practice in Essex are the responsibilities of the [Essex Safeguarding Children Board](#). In Suffolk, where some of our schools are located, the statutory partners are Suffolk County Council, Suffolk Police and Suffolk MASH. The development of appropriate procedures and the monitoring of good practice in Suffolk are the responsibilities of Suffolk MASH. Designated Safeguarding Leads (DSLs) are aware of local threshold documents which includes the processes

for local early help assessments and the type and level of early help services; they engage in discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered as part of the local arrangements.

Section 175 of the Education Act 2002 places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are students at the school.

Our schools also work in accordance with the following legislation and guidance (*this is not an exhaustive list*):

[Keeping Children Safe in Education 2026](#)

[Working Together to Safeguard Children \(DfE 2026\)](#)

[Early Years foundation stage \(EYFS\) statutory framework](#)

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>[Effective Support for Children and Families in Essex \(ESCB, 2024\)](#)

[Counter-Terrorism and Security Act \(HMG, 2015\) \(PREVENT revised 2021\)](#)

[The Prevent Duty: guidance for schools \(DfE 2024\)](#)

[Education Act \(2002\)](#)

[Serious Crime Act 2015 \(Home Office, 2015\)](#)

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

[Sexual Offences Act \(2003\)](#)

[Data Protection Act \(2018\)](#)

[Data \(Use and Access\) Act 2025, effective from January 2026.](#)

[Children Act \(1989\)](#)

[Children Act \(2004\)](#)

[Female Genital Mutilation Act 2003 \(S. 74 - Serious Crime Act 2015\)](#)

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

[Mandatory Reporting of Female Genital Mutilation - procedural information \(Home Office, updated Jan 2020\)](#)

[Information sharing advice for safeguarding practitioners \(DfE 2024\)](#)

[What to do if you're worried a child is being abused \(HMG, 2015\)](#)

[UN Convention on the Rights of the Child - UNICEF UK](#)

[School and College Security Guidance \(DfE 2023\)](#)

[Promoting the education of looked-after and previously looked-after children \(DfE, updated 2018\)](#)

[Preventing youth violence and gang involvement \(Home Office, 2015\)](#)

[Criminal Exploitation of children and vulnerable adult - county lines guidance \(Home Office, 2018\)](#)

[Suspension and Permanent Exclusion guidance \(July 2026\)](#)

[Searching, screening and confiscation \(DfE, Updated 2023\)](#)

[Preventing and Tackling Bullying \(DfE, 2017\)](#)

[Understanding and Supporting Behaviour - good practice for schools \(ECC - secure area\)](#)

[Restrictive intervention, including use of reasonable force, in schools \(2026\)](#)[Working Together to Improve School Attendance \(DfE, updated 2026\)](#)

[Children Missing in Education \(DfE, 2024\)](#)

[Education \(Pupil Registration\) Regulations 2006](#)

[Children who run away or go missing from home or care \(DfE 2014\)](#)

[Child Missing Education Policy and Practice Guidance \(ECC April 2023\)](#)

[Essex Elective Home Education Policy and Practice Guidance \(ECC\)](#)

[Elective home education - GOV.UK \(www.gov.uk\) \(DfE 2019\)](#)

[Let's Talk: Reducing the Risk of Suicide \(ECC Feb 2021\)](#)

[Teaching online safety in schools \(DfE, 2023\)](#)

[Meeting digital and technology standards in schools and colleges \(DfE, March 2025\)](#)

[Harmful online challenges and online hoaxes \(Feb 2021\)](#)

[Safeguarding and Remote Education \(DfE Nov 2022\)](#)

[Emergency planning and responses for education, childcare and children's social care settings \(DfE May 2023\)](#)

[Children Act 1989: private fostering statutory guidance \(DfE 2005\)](#)

[Designated teacher for looked-after and previously looked-after children \(DfE, updated 2018\)](#)

[Sharing nude and semi nude images - advice for education settings working with children and young people \(2024\)](#)

[Child Centred Policing - When to Call the Police: Guidance for Schools and Colleges](#)

[Keeping Children Safe in Out of School Settings \(DfE 2023\)](#)

Roles and responsibilities

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment in which they can learn and achieve their full potential. However, there are key people within schools and the Local Authority who have specific responsibilities under child protection procedures. The names of those in our schools with these specific responsibilities are shown on page 1 of this document.

The Board of Trustees ensure that each school has an appointed DSL, effective policies, procedures, and training. They have an appointed a Trust Designated Safeguarding Lead to support the schools, and a Trustee safeguarding link. They ensure that all Governors and Trustees receive appropriate safeguarding and child protection training (including online safety) at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated at least annually.

Penrose Learning Trust - Governance

The Trust Board of Penrose Learning Trust has overall strategic accountability for ensuring safeguarding compliance.

The Academy Committee in each school is responsible for monitoring safeguarding in line with the committee Terms of Reference and Monitoring Schedule and for reporting to the Trust Board.

The Academy Committee for each Penrose school has an oversight of the strategic leadership for their school's safeguarding arrangements, ensuring that the policies, procedures and training in their school are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place, that the child protection policy reflects statutory and local guidance, and that it is reviewed at least annually.

The Academy Committee ensures there is a named DSL and deputy DSL(s) in place.

The Academy Committee ensures that all staff members undergo safeguarding and child protection training (including Prevent and online safety/ filtering and monitoring) at induction, then annually; all staff members then receive regular safeguarding and child protection updates to provide them with the relevant skills and knowledge to keep our children safe.

The Academy Committee ensures that when children use the school's network to access the internet, they are protected from inappropriate content through appropriate filters and monitoring systems; these arrangements for filtering and monitoring are regularly reviewed, and governors are part of annual reviews. The Academy Committee ensures that children are taught about safeguarding, including online, through teaching and learning opportunities as part of a

broad and balanced curriculum, and effectiveness is regularly reviewed. The Academy Committee ensures schools are working in accordance with government regulations which make the subjects of Relationships Education (for primary age pupils) and Relationships and Sex Education (for secondary age students) and Health Education (for all pupils/students in state-funded schools) mandatory.

Academy Committees and proprietors should that schools have appropriate cyber security systems in place to safeguard children.

The Designated Safeguarding Lead (DSL) and Deputies

The DSL in each school takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). They manage child protection referrals, ensure appropriate safeguarding training is completed by all staff, and provide support and advice to other staff on child welfare, safeguarding and child protection matters. They ensure that everyone in school (including temporary staff, volunteers and contractors) are aware of child protection policies and procedures, and that they are followed at all times. They act as a source of advice and support for other staff on child protection matters and ensure that timely referrals to Essex Children's Social Care (Family Operations Hub), or Suffolk MASH teams are made in accordance with current procedures, and using the guiding principles outlined in Working Together to Safeguard Children (DfE, updated 2026). They work with the Local Authorities and other agencies as required, cooperating with the published arrangements for the local authorities. The DSLs are aware of students who have a social worker and help promote educational outcomes by sharing the appropriate information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

If for any reason the DSL is unavailable, the deputy designated safeguarding lead will act in their absence. A shared mailbox is available at each school, ensuring concerns are not missed if addressed to an absent colleague. In every Trust school, the shared mailbox is named: safeguarding@(followed by the school's email domain). However, **all concerns of a safeguarding nature must be placed on MyConcern, even if an email is submitted.** This will ensure all concerns are accessible by all necessary staff. During holidays and other non-working days, this shared mailbox will be periodically monitored. The school's website explains how concerns can be raised to other agencies in the event of an emergency.

Penrose Learning Trust has appointed a Trust DSL who adds support and capacity to each school's DSLs. The Trust DSL provides strategic safeguarding oversight and quality assurance across all schools, but responsibility for safeguarding within each school remains with the Headteacher and Academy Committee.

The Data Protection Act 2018, UK GDPR and the Data Act 2025 do not prevent the sharing of information for the purposes of keeping children safe. In matters of child protection, to safeguard or protect the welfare of a child or young person, the DSL will consider what information needs to be shared, and with whom, in line with statutory guidance, considering the most appropriate lawful basis for information sharing (see section 10 of this policy for more information).

The Trust DSL will work with all school DSLs to learn from complaints, and Child Safeguarding Reviews, working with wider staff as required.

The Headteacher

The Headteacher of each school works in accordance with the requirements upon all school staff. Headteachers have received appropriate training to ensure they are able to provide support and challenge to the DSLs. In addition, they ensure all safeguarding policies and procedures adopted by the Academy Committee are followed by all staff. All schools are required to ensure their procedures and expectations around use of contractors are fully compliant with KCSIE 2026. For lettings/premises hire, appropriate measures must be taken to ensure children are safe in accordance with KCSIE 2026 and the guidance [Keeping Children Safe in Out of School Settings](#).

All school staff

Everyone within Penrose Learning Trust has a responsibility to provide a safe learning environment in which our children can learn. All staff members are prepared to identify children who may benefit from early help and understand their role in this process. This includes identifying any emerging problems so appropriate support may be provided and liaising with the DSLs to report any concerns.

All staff are aware of different types of abuse, exploitation and neglect, and indicators of them, as outlined in this policy, including child-on-child abuse. This is reinforced through their induction/annual training and updates. All staff know what to do if a child tells them they are being abused, exploited or neglected - or if they suspect it. All staff members are aware of and follow school procedures as set out in this policy and are aware of how to make a referral to social care if there is a need to do so. If staff have any concerns about a child's welfare, they must act on them immediately and speak with the DSL (or deputy) within their school - they do not assume that others have taken action, and they know to maintain appropriate levels of confidentiality. They know to reassure victims they are being taken seriously and that they will be supported.

To support staff with these duties, all staff receive rigorous safeguarding and child protection training at induction and annually along with regular updates throughout the year. Specifically, all staff will be aware of the updates to Keeping Children Safe in Education, and they will complete child protection training annually, to include Prevent and Online Safety, as well as their roles and responsibilities in regard to filtering and monitoring. They are aware of the associated policies which support safeguarding in our schools and are provided these at induction/ annually (or when they are updated).

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. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation, or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build relationships with children and young people which facilitate communication. All staff are aware that technology is a component in many safeguarding and wellbeing issues. All staff will ensure they use the recognised online school systems to keep all parties safe and will work to ensure any online links suggested to students are safe by working within the school filtering and monitoring systems. They will also ensure any photographs taken of students for school purposes do not place any child at risk through their use or publication.

Penrose Central Team

In line with the Trusts safer recruitment policy, all staff employed by Penrose Learning Trust undergo safer recruitment, vetting and selection procedures in line with guidance from the national Disclosure and Barring Service, and have a relevant DBS and appropriate safeguarding training. Staff at each of the Penrose Schools are also approved visitors to each school but must present their school photo ID to be deemed as such. Penrose Central Team staff are approved staff within each school.

Visitors

All visitors must sign in using the identified systems at each school, which allows us to maintain a record of who is on school site in the case of a fire evacuation, as well as allowing visitors an opportunity to identify the DSLs in each school upon signing in, in case any visitor has concerns about a child. Visitors will be provided additional information about safeguarding upon signing in, in accordance with the nature of their visit. Visitors who do not sign in will not be permitted entry beyond reception. Visitors will be given lanyards to identify them and unless pre-approved, i.e. they provide identification, DBS and other have all appropriate checks), must remain supervised at all times inside the school building.

5. Types of abuse and neglect

Keeping Children Safe in Education (DfE, 2026) defines abuse as *“a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. This is particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children. Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse.”*

All staff are aware of the indicators of abuse, neglect and exploitation from their induction/annual training, so are able to identify children who may be in need of help or protection. Staff know that multiple issues can overlap.

The four main types of abuse referred to in Keeping Children Safe in Education are:

- Physical
- Emotional
- Sexual
- Neglect

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate, and may include verbal abuse e.g. criticising, name-calling and belittling. It may feature age or

developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it; this is referenced in this policy which includes further detail about the procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff know to consider whether children are at risk of abuse or exploitation in situations outside their families, from issues such as criminal exploitation, serious youth violence, radicalisation, county lines, sexual abuse, and domestic abuse in their own intimate relationships.

Staff are aware of safeguarding issues that can put children at risk of harm and understand that behaviours linked to issues such as drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting can be signs that children are at risk.

Children potentially at greater risk of harm

We recognise that some children may potentially be at risk of greater harm and require additional help and support. We are particularly alert to:

- Children with a social worker i.e. Looked-After Children, children subject to a Child Protection or Child in Need Plan, children working with L3 support e.g. Family Solutions, or children who are privately fostered;
- Children living in Kinship Care;
- Children who are previously looked-after (PLAC);
- Children with additional needs and disabilities.

Children with a social worker

At Penrose Learning Trust we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support students who have a social worker.

Children with special educational needs and disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration;
- That they may be more prone to peer group isolation or bullying than others;
- The potential to be disproportionately impacted by things like bullying, without outwardly showing signs;
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,
- the need for intimate care or that these children are isolated from others,
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

To address these additional challenges, our schools should consider extra pastoral support for children with SEND particularly when investigating any form of child-on-child abuse, including close liaison with the SENCo, particularly where students may need support with communication if there is a safeguarding concern.

Schools understand that positive action might be necessary to meet the specific needs of students with certain protected characteristics. It is understood that there is a duty to make reasonable adjustments for disabled children.

Child-on-Child Abuse

Penrose Learning Trust recognises that children can abuse other children, and that this is a safeguarding issue affecting both the child who has experienced the abuse and the child alleged to have caused it. Child-on-child abuse can occur online, offline, inside or outside school, and may involve individuals or groups of children.

The Trust has a zero-tolerance approach to all forms of child-on-child abuse. Abuse will never be dismissed as banter, part of growing up or harmless behaviour. All concerns will be taken seriously, responded to promptly and managed in accordance with this policy and Part 5 of *Keeping Children Safe in Education (2026)*.

Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying,
- prejudice-based abuse and bullying, including misogynistic, misandrist, racist, ableist, sexist, homophobic, biphobic, transphobic language or behaviour, or religion/belief discrimination;

- abuse in intimate personal relationships between children;
- physical abuse, including serious violence or threats of violence, whether occurring in person or facilitated online;
- sexual violence and sexual harassment;
- causing someone to engage in sexual activity without consent;
- the consensual and non-consensual making, sharing or possession of nude and semi-nude images and/or videos, and the sharing of unwanted sexualised or explicit content, including pornography;
- upskirting, which is a criminal offence;
- initiation or hazing-type violence and rituals.

This abuse may be motivated by prejudice or perceived differences, including race, religion, sex, disability, sexual orientation or gender identity, and can have a significant and long-lasting impact on a child's physical, emotional and mental wellbeing. The Trust recognises that child-on-child abuse may affect children differently and that gendered patterns of abuse, particularly sexual harassment and sexual violence, require particular awareness and a sensitive, victim-centred response.

Staff should recognise that whilst a child being LGBT is not in itself an inherent risk factor for harm, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The Trust is committed to preventing child-on-child abuse through whole-school approaches to safeguarding, behaviour, relationships, sex and health education (RSHE), online safety and an open culture in which children feel safe to speak to trusted adults. We recognise that child-on-child abuse may go unreported and are committed to early identification, effective intervention and partnership working to safeguard all children and reduce the risk of further harm.

The Trust recognises that mobile phones, personal devices and online platforms can facilitate child-on-child abuse, including harmful sexual behaviour. Expectations regarding the safe use of mobile phones and personal devices are set out in each school's Behaviour Policy.

All incidents of child-on-child abuse covered by this policy are recorded. Safeguarding records and logs are regularly monitored and reviewed to identify patterns, emerging risks and ensure that appropriate action has been taken.

Types of child-on-child abuse

There are many forms of abuse that may occur between children, and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described followed by advice and support on actions to be taken. Further information about each type of abuse can be found in Keeping Children Safe in Education 2026, and in annual child protection training.

Harmful sexual behaviour

The school will also respond to low-level inappropriate sexualised behaviour and language at the earliest opportunity through education, challenge and proportionate intervention to prevent escalation into more harmful behaviour.

Harmful sexual behaviour exists on a continuum from developmentally appropriate behaviour to inappropriate, problematic, abusive and violent behaviour, and therefore developmentally inappropriate. A useful umbrella term is “harmful sexual behaviour” (HSB). Children displaying HSB may themselves have experienced abuse or trauma and should receive appropriate safeguarding support. Professional judgement will always be applied and recognised assessment tools, such as Brook's Traffic Light Tool or Hackett's Continuum, will support rather than replace safeguarding decision-making. DSLs will use recognised evidence-informed assessment tools. The [NSPCC guide](#) is one tool used to support DSLs.

Behaviour may also be considered harmful even where no other child is directly involved, for example where it is significantly outside what is age or developmentally appropriate and indicates that the child may require safeguarding support. Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. Children who display harmful sexual behaviour may have experienced abuse, trauma or other adverse experiences themselves. Understanding the reasons behind the behaviour is an important part of determining the most appropriate safeguarding response and intervention. It may be just as distressing to the young person who instigates it as to the young person it is intended towards. HSB can escalate into sexual harassment or sexual violence, which is why schools will log and track HSB and incidents of misogyny, and offer interventions to prevent escalation.

DSLs undertake additional training on HSB, either through the local authority, and/or using recognised evidence informed assessment tools, such as Brook's Traffic Light Tool, or Hackett's continuum, to consider whether behaviour is age and developmentally appropriate. [NSPCC resources](#) are also used as required.

Harmful Sexual Behaviour between children, including Sexual violence and sexual harassment

Children can abuse other children. This may include harmful sexual behaviour (HSB), sexual violence and sexual harassment, which can occur between children of any age and sex. Incidents may involve individuals or groups, occur online or face-to-face (both physically and verbally), and are never acceptable or an inevitable part of growing up.

Any concern relating to harmful sexual behaviour, sexual violence or sexual harassment must be reported immediately to the Designated Safeguarding Lead (DSL).

Sexual violence refers to criminal offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

Following any report of sexual violence, the DSL (or deputy DSL) will undertake an immediate risk and needs assessment.

Sexual harassment is defined as **unwanted conduct of a sexual nature** that occurs online or offline, inside or outside school, and is likely to violate a child's dignity or create an intimidating, hostile, degrading, humiliating or sexualised environment.

Examples of sexual harassment include, but are not limited to:

- sexual comments, stories, jokes, taunting or sexualised name-calling, potentially around appearance;

- unwanted physical behaviour, including deliberately brushing against someone, interfering with clothing, grabbing breasts, buttocks or genitalia, flicking bras or lifting skirts;
- displaying, sharing or showing sexual images, photographs or drawings;
- upskirting, which is a criminal offence;
- unwanted sexual communication online, including explicit content, coercion, threats and pressure to share intimate images or engage in sexual activity.
- sharing unwanted explicit content or engaging in sexualised online bullying;
- pressuring or coercing another child to share nude or semi-nude images or videos or to engage in sexual activity online; and
- consensual and non-consensual sharing of nude or semi-nude images and/or videos. Staff should recognise that creating, possessing or sharing indecent images of anyone under 18 may constitute a criminal offence.

Where there has been a report of sexual harassment, the need for an ongoing risk assessment should be considered on a case by case basis.

Staff must:

- make it clear that harmful sexual behaviour, sexual violence and sexual harassment are unacceptable and will never be tolerated, never dismissing such behaviour as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- ensure children should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should they ever be made to feel ashamed for making a report;
- challenge inappropriate sexualised language and behaviour promptly and consistently; and
- report all concerns in line with the school's safeguarding procedures.

When assessing harmful sexual behaviour, the DSL will consider the age and developmental stage of the children involved, the nature of the behaviour, any power imbalance, coercion, intimidation or exploitation, and whether there are any additional vulnerabilities. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Self-generated intimate images and/or videos, including AI-generated deepfakes

'Making or sharing nudes and semi nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'. *Staff are aware that consensual image sharing is still illegal; this is sometimes referred to as 'sexting'.*

Staff use the latest DfE guidance on sharing nude and semi-nude images when determining the appropriate response, including the guide from UKCCIS [Sharing nudes and semi-nudes: Advice for Education settings](#)).

This does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police

In regard to any nude or semi-nude imagery, staff must be aware of how to keep themselves safe when dealing with any imagery. Staff are all aware not to look at or open images or forward these to any individual unless specifically requested by the police.

If an incident comes to the attention of staff, they are advised to:

- Report it to the DSL immediately;
- Not to view, copy, print, share, store/download the imagery themselves, or ask a child to share or download - **this is illegal**;
- If they have already viewed the imagery by accident (e.g. if a young person has showed it to them before they could ask them not to), they will report this to the DSL and support will be provided;
- Not delete the imagery or ask the young person to delete it;
- Not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL;
- Not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents/carers;
- Not say or do anything to blame or shame any young people involved;
- Explain to the student that they need to report it and reassure them that they will receive support and help from the DSL, and that they will be kept informed throughout the process.

DSLs will use the [guidance](#) to determine appropriate next steps, particularly whether external agencies need to be informed, or whether the incident can be managed by the school, informing parents for most incidents.

As noted in guidance, in exceptional circumstances, it may be necessary for the DSL or equivalent to view the image to identify and fully safeguard the children involved, in line with [Searching, Screen and Confiscation guidance](#).

Upskirting

This 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. It is a criminal offence. Anyone of any gender, can be a victim. Again, this must be referred immediately to the DSL, and the guidance above may still apply.

Teenage relationship abuse

Abuse within intimate personal relationships between children may include physical, emotional, sexual, coercive or controlling behaviour. Concerns may also indicate child sexual exploitation or other safeguarding issues and must be reported to the DSL immediately.

Physical abuse between children

Physical abuse between children includes hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, or the threat of harm with a weapon. It may also include behaviour facilitated or encouraged online. There may be many reasons why a child harms another, and it is important to understand why a young person has engaged in such behaviour, including whether this could have been accidental, before considering the action or punishment to be undertaken.

Bullying, Online Bullying and Prejudice-Based Abuse

Bullying, including cyberbullying and prejudice-based bullying, is a form of child-on-child abuse. It is characterised by unwanted, aggressive behaviour that involves a real or perceived

power imbalance and is **repeated**, or has the potential to be repeated, over time. Bullying can have a significant impact on a child's physical and emotional wellbeing.

Bullying may be physical, verbal, relational or online and can include:

- making threats, intimidation or harassment;
- spreading rumours or deliberately excluding someone from a group;
- physical or verbal attacks;
- sharing or posting abusive, humiliating or threatening messages, images or videos online;
- impersonation, trolling or anonymous abuse; and
- encouraging self-harm or pressuring another child to engage in harmful or abusive behaviour.

Some forms of bullying may constitute a criminal offence or safeguarding concern and must be reported immediately to the Designated Safeguarding Lead (DSL). All incidents will be managed in accordance with this policy and the school's Anti-Bullying Policy.

Bullying may be motivated by prejudice or hostility relating to a protected characteristic or perceived difference. This includes racist, sexist, misogynistic, misandrist, homophobic, biphobic, transphobic, disability-related or faith-based abuse, as well as other discriminatory behaviour. Such incidents will be treated seriously, recorded on the school's discrimination recording system and safeguarding system (MyConcern), and monitored to identify patterns, emerging concerns and any further action required.

Where prejudice-related behaviour may amount to a hate incident or hate crime, the DSL will consider whether a referral to the police or other appropriate agencies is required.

Initiation/Hazing

Initiation or hazing rituals involve activities intended to humiliate, abuse or endanger a child as part of joining or belonging to a group. Hazing may occur in person or online and will be treated as child-on-child abuse.

Many rituals involve humiliation, embarrassment, abuse, and harassment; using this definition, schools should also consider incidents that are filmed or in public where this appears to be the primary motivation, even if this isn't as part of joining a group or organisation.

Responding to Child-on-Child Abuse

All concerns relating to child-on-child abuse must be taken seriously and responded to promptly in accordance with this policy and the Trust's safeguarding procedures. All incidents of sexual violence and sexual harassment must be reported immediately to the Designated Safeguarding Lead (DSL). Other forms of child-on-child abuse may initially be managed by pastoral staff where appropriate e.g. physical abuse or bullying; however, the DSL should always be informed as part of the initial report where there is any safeguarding concern or uncertainty. Students are encouraged to report child-on-child abuse in the same way they report any other safeguarding incidents. However, we recognise that some incidents may initially go through behaviour systems and teams, and therefore DSLs ensure these staff have the suitable training to know how to respond to these in the first instance, and involve the DSLs as required.

Staff must never assume that abuse is not occurring because it has not been reported. Child-on-child abuse may go unreported and staff should remain vigilant to signs and indicators, challenge inappropriate behaviour and report concerns without delay. The school recognises that children may not find it easy to tell staff about abuse and may delay reporting. Delays should not affect how seriously a report is taken. Where there is an immediate risk of harm, protecting the safety of all children is the first priority.

The safety, wishes and lived experience of the child who has experienced the abuse will always be central to the school's response. Children will be listened to, taken seriously and supported to report concerns without fear of blame or embarrassment, regardless of when the abuse occurred. Safeguarding arrangements apply whether the abuse took place in school, outside school or online, and whether or not the child alleged to have caused the harm attends one of our schools.

Immediate Action

It is important that schools consider every report on a case-by-case basis. Where there are immediate concerns for a child's safety, staff must take appropriate action to protect all children involved. This may include supervising or separating children while advice is sought from the DSL. Staff should:

- always take concerns and disclosures seriously;
- ensure the child who has experienced the abuse is safe and feels safe;
- listen carefully and reassure the child that they have done the right thing by speaking up;
- make an immediate referral to the DSL;
- record the concern promptly and accurately on the school's safeguarding recording system; and
- preserve any evidence where appropriate, particularly in cases involving sexual violence, online abuse or the sharing of images.

Staff must not:

- promise confidentiality;
- investigate allegations themselves;
- ask leading or probing questions;
- interview children together;
- ask children to write statements without guidance from the DSL;
- contact parents or carers without agreement from the DSL where safeguarding concerns exist; or
- attempt restorative conversations or mediation before safeguarding advice has been sought.

Consideration should be given to protecting the privacy of all children involved whilst ensuring appropriate information sharing for safeguarding purposes. Information will only be shared on a need-to-know basis in line with safeguarding and data protection requirements to protect the anonymity of children involved wherever possible, considering the potential impact of rumours and impact of social media.

Considering the Concern

The DSL will consider each incident individually, recognising that child-on-child abuse exists on a continuum from inappropriate behaviour through to abusive and criminal behaviour. In assessing concerns, consideration will be given to:

- the chronological and developmental ages of the children involved;
- any differences in power, authority, maturity, size or vulnerability;
- the nature, frequency and seriousness of the behaviour;
- whether coercion, intimidation, exploitation or threats were involved;
- the impact on the child who has experienced the abuse;
- whether the behaviour demonstrates inappropriate sexual knowledge or motivation;
- whether the behaviour forms part of a wider pattern;
- any attempts to conceal the behaviour; and
- any previous safeguarding concerns relating to those involved.

Abuse occurring online or outside school will be treated as seriously as abuse occurring on the school site. Where Children's Social Care or the police are involved, the DSL will work closely with partner agencies to ensure that safeguarding action does not prejudice any investigation.

When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to local authority children's social care and/or the police, then, as a general rule, the DSL should speak to the local authority children's social care and the police and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school or college taking immediate action to safeguard its children, where required. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

Risk Assessment and Decision Making

The DSL will determine the most appropriate response in accordance with Keeping Children Safe in Education 2026 and, where appropriate, in consultation with Children's Social Care, the police and other partner agencies.

The response may include:

- managing the incident internally, including making referrals for school and community based Early Help;
- referral to Children's Social Care (Hub/C-SPOC/MASH), including targeted Early Help;
- referral to the police;

Other actions may include:

- disciplinary action in accordance with the Behaviour Policy;
- implementation of a safeguarding risk assessment;
- temporary separation of children for safeguarding purposes where necessary; and
- ongoing support for all children involved.

Where there has been a report of sexual violence, the DSL will undertake an immediate risk and needs assessment. Following reports of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

Risk assessments will be recorded on the school's safeguarding recording system, reviewed regularly and updated as circumstances change. The Trust's Risk Assessment forms are available in the Safeguarding Handbook. These should be used to support this process and helps ensure appropriate measures are implemented to safeguard all children involved and, where necessary,

the wider school community. Risk management meetings should normally be chaired by the DSL (or deputy DSL) and involve relevant pastoral staff and partner agencies, where appropriate.

The risk assessment will consider:

- the wishes, safety and support needs of the child who has experienced the abuse;
- whether there may be other children at risk;
- any ongoing risks presented by the child alleged to have caused the harm;
- the safety and wellbeing of other children and staff;
- any previous relevant safeguarding concerns or patterns of behaviour; and
- any measures required to reduce ongoing risk.

Where children remain in school together, the risk assessment will consider practical arrangements such as supervision, movement around the site, social times, transport and extracurricular activities. Social media and protecting anonymity will be a consideration. The wishes of the child who has experienced the abuse will be considered throughout the process and, wherever possible, they will be supported to have a meaningful voice in decisions about their ongoing safety and support. The priority will be to ensure that they can continue their education in a safe environment with as little disruption as possible.

The Trust recognises that the child alleged to have caused the harm may also require safeguarding, pastoral or therapeutic support. Any measures put in place will seek to manage and reduce risk while ensuring that the child continues to receive appropriate education and support, unless alternative arrangements are necessary to safeguard others. Decisions will be made on a case-by-case basis, taking account of the rights, welfare and educational needs of all children involved.

Safeguarding and behaviour processes are separate and may run concurrently. In certain circumstances, the school may temporarily forbid a pupil from attending its premises, for example due to an allegation of harm by one pupil against another which requires pupils to be physically separated. This is not a suspension on disciplinary grounds and is outlined in the [Suspension and Permanent Exclusion guidance \(2026\)](#) as 'Separation of pupils for safeguarding purposes'. It should only be used where separating pupils is essential and cannot practicably be done in a way that allows the relevant pupil or pupils to remain on the school premises through alternative arrangements, such as supervised separation. Where temporary separation is required for safeguarding purposes, the school will seek, wherever reasonably practicable, to minimise disruption to the education of both children while maintaining the safety and wellbeing of the wider school community.

Where a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether either child requires additional safeguarding support or referral to Children's Social Care. Where a report is determined to have been deliberately invented or malicious, an appropriate response will be considered in accordance with the Behaviour Policy, while continuing to safeguard all children involved.

Safeguarding responsibilities continue beyond the initial response. Support, monitoring and risk management will remain in place for as long as necessary to safeguard all children involved, reduce the likelihood of further incidents and promote positive outcomes.

Our coordinated approach to safeguarding records means that when incidents occur, these are logged and staff will consider previous incidents in order to spot patterns, and consider an appropriate response. This ensures that consideration is given to problematic or harmful behaviour and the risk of incidents re-occurring. Logs will include a column for "follow up". Our schools will share wider trends as relevant with staff to ensure that there is no complacency

with child-on-child incidents; we are also aware that even if there have been no reports, this does not mean it is not happening, and so work will be done then to ensure there is clear understanding from both students and staff about what should be reported.

Where appropriate, we will work with parents, carers and partner agencies to safeguard all children involved, including providing support for siblings and responding appropriately to incidents of intra-familial harm.

Police

Where the police are involved, the school will work closely with partner agencies to ensure that risk management measures safeguard all children while respecting the rights of the child alleged to have caused the harm and complying with statutory safeguarding and reporting duties.

Information will be shared with partner agencies on a need-to-know basis, in accordance with data protection legislation, safeguarding duties and advice from the police.

If bail conditions are imposed, the school will need to consider whether additional measures may be necessary to manage risks which may arise within school. The school needs to ensure that any risk management measures strike a balance between management of risk and the rights of an un-convicted person (e.g. rights to privacy, family life, etc.).

Where the police or Children's Social Care are investigating, the Designated Safeguarding Lead (DSL) (or deputy) will work closely with the relevant agencies to ensure that any action taken by the school does not prejudice those investigations or any subsequent prosecution, attending multi-agency meetings as required.

Risk assessments and safeguarding plans will be reviewed whenever new information becomes available and at agreed intervals throughout any investigation or criminal proceedings.

The school may take disciplinary action in accordance with its Behaviour Policy where appropriate. Decisions will be informed by safeguarding considerations, advice from external agencies and the school's own findings, applying the civil standard of proof (the balance of probabilities). Decisions will be made on a case-by-case basis, taking account of the advice of partner agencies, the stage of any investigation and whether it is appropriate for the school to reach its own findings while the same matters are being considered by another agency.

There may be delays in any case that is being progressed through the criminal justice system. The guidance is that schools should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school or college.

If a child is convicted or cautioned for a sexual offence, the school or college should update its risk and needs assessment, ensure relevant protections are in place for all the children at the school or college and consider any suitable action in line with their behaviour policy.

If a case results in "no further action" by the police or Crown Prosecution Service, or a not guilty verdict, the school or college should continue supporting both the victim and the alleged perpetrator(s) for as long as is necessary. These outcomes will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools should discuss any decisions with the victim in

this light and continue to offer support. The alleged perpetrator(s) is/are also likely to require ongoing support for what will have likely been a difficult experience.

Recording

All concerns, discussions, decisions and the reasons for decisions will be recorded in writing on the school's safeguarding recording system as soon as possible.

Staff should:

- distinguish between fact, professional opinion and the child's own words;
- use the child's exact words where appropriate, recording them in quotation marks;
- use clear, factual and objective language;
- avoid assumptions, opinions or euphemisms;
- Use proper names for body parts but record exactly any language or vocabulary used by the child.
- accurately record dates, times, locations, witnesses and actions taken (as prompted by the online safeguarding recording system); and
- record any online elements of the incident.

Monitoring will inform safeguarding practice, staff training, curriculum planning and wider preventative strategies where emerging themes or patterns are identified.

Supporting Children

The wishes, views and lived experience of the child who has experienced the abuse will always be considered when determining the appropriate response. Children will be reassured that they are being taken seriously, will be protected from further harm and will never be blamed or made to feel responsible for reporting abuse.

Children will be aware through preventative educational opportunities, as well as after an incident has been reported, that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

We recognise that children who display abusive behaviour may have experienced abuse, trauma or other adverse experiences themselves. While this does not excuse their behaviour, it is important that they are supported alongside any safeguarding or disciplinary response. Appropriate support will also be offered to the child alleged to have caused harm, recognising that they may have experienced abuse, trauma or other unmet safeguarding needs themselves. This support does not diminish accountability for their behaviour but seeks to reduce the risk of further harm through appropriate intervention. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

The effectiveness of support and risk management arrangements will be reviewed regularly and amended where necessary in response to changing circumstances or the views of the children involved. Support for any involved party may include:

- pastoral support;
- safeguarding intervention;
- Family (Early) Help;
- counselling or therapeutic support;
- referrals to specialist agencies;
- risk management plans; and
- regular review meetings with children and, where appropriate, parents or carers.

Restorative approaches should only be considered where they are appropriate, voluntary and in the best interests of the victim. They should never be used to minimise sexual violence or sexual harassment, nor should a victim ever be pressured to participate.

Parents or carers will normally be informed unless doing so would place a child at increased risk of harm. Decisions about informing parents will be made by the DSL in consultation with partner agencies where appropriate. The best way to inform parents/carers is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents/carers whether their child is the child who was harmed or who harmed another.

Where cases are classified as “no further action” by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Decisions should be discussed with the victim in this light and continue to offer support.

The alleged perpetrator(s) is/are also likely to require ongoing support for what will have likely been a difficult experience

Staff involved in managing serious child-on-child incidents should have access to appropriate support, supervision and debrief from safeguarding leaders, recognising the emotional impact of such cases.

Preventative Strategies

The Trust recognises that child-on-child abuse can occur in any school or college, even where there are robust safeguarding systems in place. We are committed to a proactive, whole-school approach to preventing child-on-child abuse by promoting a culture of respect, inclusion and safety. We foster a culture of zero tolerance towards sexism, racism, misogyny, misandry, homophobia, biphobia, sexual harassment, sexual violence, derogatory behaviour and other forms of abuse or violence. Pupils are supported to understand acceptable behaviour, feel listened to and know how to seek help. These principles are reinforced through the school’s values, behaviour expectations, pastoral support and safeguarding arrangements. This ensures children understand acceptable behaviour, feel listened to and know how to seek help.

Prevention is achieved through:

- a strong safeguarding culture where children feel safe to speak to trusted adults and are confident that concerns will be taken seriously;
- a planned, spiralled, age-appropriate curriculum, including Relationships, Sex and Health Education (RSHE), which promotes healthy relationships, respect, consent, online safety, equality, and challenges harmful attitudes, stereotypes and prejudiced behaviour (more details of the curriculum at each school are available in their RSE policies.)
- clear reporting systems and effective signposting to support within school and external agencies, enabling children to report concerns or seek advice;
- pupil voice opportunities, including school councils and other forums, which encourage children to contribute to the development of a positive and respectful school culture;
- appropriate restorative, educational and reflective work following incidents, where suitable, to reduce the likelihood of behaviours being repeated;

- regular safeguarding training for all staff to enable the early identification of child-on-child abuse and appropriate responses; and
- ongoing monitoring of safeguarding concerns by Designated Safeguarding Leads (DSLs) to identify patterns, emerging risks and children who may benefit from Early Help or additional support.

Through RSHE, assemblies, pastoral work and the wider curriculum, pupils are taught the knowledge and skills needed to build positive, respectful relationships. This includes healthy relationships, boundaries, consent, kindness, equality, body confidence and self-esteem, recognising coercive and controlling behaviour, understanding that sexual harassment and sexual violence are never acceptable, and knowing how and where to seek help. Pupils also learn about online harms, including the sharing of images, the prevalence of deepfakes, pornography, misogynistic influencers and other harmful online content, and how to report concerns and access support.

Leaders regularly review safeguarding data, trends and patterns relating to child-on-child abuse to inform staff training, curriculum development and wider preventative strategies, including helping to identify students who are demonstrating problematic behaviour which could become harmful. Further information about each school's Relationships, Sex and Health Education (RSHE) curriculum is available in the school's RSHE Policy.

Other types of abuse

Financial Exploitation and Sextortion

Financial exploitation may take the form of fraud or scams. Cases of Financially motivated sexual extortion (sextortion) have increased globally. Children are being forced into paying money or meeting another financial demand (such as purchasing a pre-paid gift card) after an offender has threatened to release nudes or semi-nudes of them. This is financially motivated sexual extortion, a type of online blackmail often referred to in the media as 'sextortion'. It is a form of child sexual abuse. Financially motivated sexual extortion is usually carried out by organised crime groups (OCGs) based overseas who are typically motivated by money. These groups target all ages and genders however, a large proportion of cases have involved male victims aged 14-18. OCGs may target multiple children and young people within an education or wider social setting, as it is more likely that a child or young person will accept a friend request or communicate with someone they don't know if they believe they are a 'mutual friend'.

All staff should report disclosures around incidents of this nature to the DSL who will refer to the relevant local authority/ police.

Serious violence

All staff are aware of indicators which may signal that children are at risk from or involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs. Our schools are aware that violence can often peak in the hours just before or just after school, when pupils/students are travelling to and from school. These times can be particularly risky for young people involved in serious violence and so this is a key consideration for any risk assessments the school develop.

Schools recognise the likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been suspended, spent time in Alternative Provision or permanently excluded from school,
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery
- having used drugs or alcohol in early adolescence, and
- having previously been a victim or previously perpetrated violence.

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

Both Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the child needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator, and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the child may identify as being part of this group. CCE and CSE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery. Where a potential victim of CCE or CSE is identified, the school will follow the Modern Slavery statutory guidance and complete the appropriate child protection and modern slavery referrals, as required, in accordance with Keeping Children Safe in Education (2026).

Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of child abuse, which can happen to boys and girls from any background or community.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

It is understood that a significant number of children who are victims of CSE go missing from home, care and education at some point. Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns. The DSL will lead on these issues and work with other agencies as appropriate.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing.

They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. 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. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. Girls can be criminally exploited too, although indicators may be different.

Child criminal exploitation is a geographically widespread form of harm which is a typical feature of county lines criminal activity (county lines is when drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban areas and seaside towns). Our schools work with key partners locally to prevent and respond to child criminal exploitation. Staff understand those involved in CCE may be more at risk of sexual exploitation.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Staff utilise and work in line with the [County Lines Toolkit for Professionals](#). One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. Once the victim has been safeguarded, and appropriate referrals made to relevant agencies, these first responder organisations can consider a referral to the National Referral Mechanism.

Contextual safeguarding

We understand that safeguarding incidents and behaviours can be associated with factors in the community. We always consider relevant information when assessing any risk to a child to ensure that our children and families receive the right help at the right time. [Contextual Safeguarding](#) is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. Safeguarding incidents and behaviours can be associated with factors outside our school. All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors present in a child’s life are a threat to their safety and/or welfare. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse

- including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation. To this end, we will consider relevant information when assessing any risk to a child and share it with other agencies to support better understanding of a child and their family.

Cybercrime

Cybercrime is criminal activity involving computers and/or the internet. It includes both **cyber-enabled** offences (crimes that are facilitated by technology) and **cyber-dependent** offences (crimes that can only be committed using computers or digital networks), such as unauthorised access to computer systems (hacking), denial of service attacks, and creating, supplying or using malicious software.

The school recognises that some children, particularly those with advanced computing skills or a strong interest in technology, may be vulnerable to becoming involved in cyber-dependent criminal activity, either deliberately or without fully understanding the legal and ethical consequences.

Where there are safeguarding concerns that a child may be at risk of engaging in, or being exploited through, cyber-dependent crime, the Designated Safeguarding Lead (DSL) or deputy will consider appropriate safeguarding action, including referral to the police-led **Cyber Choices** programme where appropriate. The school will work with parents, carers and relevant agencies to support children to use their digital skills safely, responsibly and lawfully.

Domestic Abuse

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. The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators are offered support.

We work with other key partners, including Operation Encompass, and will share relevant information where there are concerns that domestic abuse may be an issue for a child or family, or be placing a child at risk of harm. Operation Encompass is an information-sharing scheme between the police and relevant 161 education settings operating in all police forces across England and Wales. In November 2025, a statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children connected to a household where they have attended a domestic abuse incident; children who are physically present at the incident, children not physically present during the incident, and situations where a child might reside in another household temporarily or permanently. The aim of the duty is to support education settings to provide timely, informed support to children affected by domestic

abuse, to ensure the school has up to date information about the child's circumstances and enable immediate support to be put in place according to the child's needs. This places no new responsibilities on education settings. Where appropriate, the police and/or schools should make a referral to social care if they are concerned about a child's welfare.

So-called 'honour-based abuse' (including Female Genital Mutilation and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the DSL as a matter of urgency, taking into account the specific legal duty on teachers around FGM below.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers (and other professionals); 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 personally to the police (Serious Crime Act October 2015). Our school will operate in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures.

Forced Marriage

A forced marriage is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Staff are aware that even without threats or other forms of coercion, it is a crime for anyone to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, and this includes non-binding unofficial marriages, as well as legal marriages. Our staff understand how to report concerns where this may be an issue in line with [The Right to choose: government guidance on forced marriage](#), contacting the Forced Marriage Unit if they need advice or information on 020 7008 0151 or fm@fcdo.gov.uk.

Prevention of radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our schools' safeguarding approach. As of July 2015, the [Counter-Terrorism and Security Act \(HMG, 2015\)](#) placed a duty on schools and other education providers. Under section 26 of the Act, schools are required, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to negate or destroy the fundamental rights and freedoms of others; or undermine, overturn or replace the UK's system of liberal parliamentary democracy and

democratic rights; or intentionally create a permissive environment for others to achieve such results (updated [definition](#)).

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The Prevent duty requires schools to:

- Ensure susceptibility to radicalisation is incorporated into safeguarding training;
- Ensure the process for raising concerns is in policy. Information about how to report concerns of radicalisation is on page 3 of this policy. Any concerns should be placed on **MyConcern**.
- Ensure staff are alert to changes in children's behaviour, which could indicate that they may be in need of help or protection;
- Ensure staff use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral;
- Take action to limit the potential harm and influence of radicalisers e.g. clear lettings policies, careful use of external speakers;
- Work in accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate, and co-operating with Channel Panels;
- Ensure DSLs have sufficient training;
- Engage appropriately with other partners such as the police and Prevent leads in the local authority. As part of the additional training for DSLs, we receive regular updates from the Essex Safeguarding Prevent Lead to inform our school risk assessments and approach;
- Perform a risk assessment, considering how learners or staff may be at risk of being radicalised into terrorism, including online.

The Prevent Duty does not limit discussion of issues. Instead, our schools:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of students and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion. This includes an active promotion of British Values;
- are safe spaces in which children/young people can understand and discuss controversial issues, helping learners to understand how they can influence and participate in decision making;
- promote democracy through wider school opportunities;
- are mindful of their existing duties on political impartiality.

Channel is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. DSLs are also aware of the documentation, [The Prevent duty: an introduction for those with safeguarding responsibilities](#) in regards to best practice.

Online safety

Staff in our schools recognise that our children are growing up in an increasingly complex world, living their lives on and offline. This presents many positive and exciting opportunities, but we recognise it also presents challenges and risks. Any student can be vulnerable online, and their vulnerability can fluctuate depending on their age, developmental stage and personal circumstance. We want to equip our students with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world. All our schools are mindful of Artificial Intelligence and the growing risk this poses to young people and will ensure that pupils are educated in its risks and how to use it safely.

The range of online risks could be categorised as:

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example, peer to peer pressure, commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes, including sextortion (see section on sextortion);

Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI, and online bullying;

commerce: risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

All staff in our schools are aware of the risks to children online and we seek to help children keep themselves safe online in a range of ways.

Our schools are aware of the [Digital and Technology Standards in School and Colleges Guidance](#) (DfE updated 2026), ensuring that we:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually, with the DSL ensuring that safeguarding concerns identified through monitoring are acted upon appropriately.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

Records will be kept of reviews and checks.

Monitoring user activity on school devices is an important part of providing a safe environment for children and staff. All staff should:

- provide effective supervision
- take steps to maintain awareness of how devices are being used by pupils
- report any safeguarding concerns to the DSL

All staff are aware of how to report safeguarding and technical concerns in their school. As part of safeguarding training, staff know that they should report if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material

- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material

Our schools will liaise with parents/carers to reinforce the importance of children being safe online. We use Arbor and/or the school email system if we need to interact with students online. We encourage parents/carers to speak directly to school staff setting any online work if they have any concerns.

Many students are able to access the internet using their own data plan and via remote online learning. For systems in place such as Teams and Google Classrooms, we have security policies in place that prevent students from making calls, starting meetings without teachers present and posting content into the Teams channels without teacher authorisation. With school provided laptops that students are taking home, we will have the same systems in place as those that are used in school, including monitoring software that triggers and alerts DSLs when a keyword is picked up. The alerts also extend to visual threats to cover students, and the bank of keywords comes directly from the UK Safer Internet Centre. School provided laptops will also be filtered to protect students from inappropriate content.

The school recognises that technology and social media can provide significant educational and social benefits, but inappropriate or excessive use may affect children's wellbeing, learning, sleep and relationships. Through a whole-school approach to online safety, pupils are supported to develop safe, healthy and responsible digital habits, and concerns about a child's online activity or wellbeing will be responded to in line with this policy.

Other risk factors

Children missing from education

All children, regardless of their age, ability, aptitude and any special education needs they may have, are entitled to a full-time education. Our schools recognise that children being absent for prolonged periods and/ or on repeat occasions can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include 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, “honour” based abuse or risk of forced marriages.

Schools are aware that their response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of a child going missing in the future. This includes when problems are first emerging, but also when children are already known to social care and being absent from education may increase the known safeguarding risks within the family or in the community.

As part of safeguarding and Health and Safety procedures, we take daily registers and follow up on any absences if the child does not attend as expected. This data is used to identify patterns of absence as they emerge, to ensure any concerns are identified and addressed at an early stage.

Parents/carers should always inform us of the reason for any absence. Where contact is not made by the parents/carers, and any contact attempted by the school has been unsuccessful, a referral

may be made to another appropriate agency as required (e.g. Social Care, Children Missing Education, Police etc). Parents/carers are required to provide at least two emergency contact numbers to the school, so that we are able to communicate with someone if we need to. It is also recognised that children may be vulnerable to or be exposed to other risks when not in school, so we work with parents/carers and other agencies to keep children in school whenever possible.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risk of a child going missing in future. All staff are aware of their school's unauthorised absence and children missing from education procedures.

Elective Home Education

Schools are aware of their duty to notify the Local Authority of any child removed from roll to be Electively Home Educated and follow the necessary procedures to flag any safeguarding concerns around this arrangement.

Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. There are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention.

However, if staff have a concern about a child's mental health that is also a safeguarding concern e.g. risk of harm to themselves or others, they should follow their child protection policy and speak to their designated safeguarding lead or deputy, who will consider appropriate next steps to ensure their immediate safety and wellbeing.

Section 17 explains each school's approach to supporting mental health.

Temporary accommodation notification duty

The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions when a child is placed in temporary accommodation. The notification will enable school staff to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes.

Remote Working/Learning

Keeping children and staff safe during any periods of remote education is essential, and so we have additional guidance in our Trust Safe Remote Teaching/Learning/ Working Policy regarding safe practices employed by our schools.

As per the government guidance [Emergency planning and response for education, childcare, and children's social care settings](#), should we need to limit people on site, we will determine students who would be considered vulnerable, as these students should be prioritised for continued face-to-face education; this may also be the case for children of critical workers. Schools will ensure a trained DSL (or deputy) is available on site, or is contactable if they cannot attend the school in person. Vulnerable students may also need additional pastoral support if they are unable to attend in person; this would be determined on a case-by-case basis.

All staff should continue to act immediately if they have any concerns about a child or young person's welfare, whether the child or young person is physically in school or learning from home. If staff are working from home, concerns should be raised via MyConcern), taking personal action to contact the relevant agencies if there is an immediate risk of harm as per Section 7 of this policy.

Alternative Provision

The school remains responsible for safeguarding and promoting the welfare of pupils placed in alternative provision and will seek assurance regarding safeguarding arrangements. Detailed guidance can be found at [Alternative provision - GOV.UK \(www.gov.uk\)](#)

When the school places a pupil with an AP provider the school continues to be responsible for the safeguarding of that pupil. The school will, therefore, show due diligence in the choice of AP providers, which will almost always be on an approved list from County, and will have additional and frequent measures to check the welfare of pupils who are attending AP.

In order to ensure the safety of our pupils, the School will gain written confirmation from the alternative provider that appropriate staff safeguarding checks have been carried out, as well as written information about any arrangements that may put the child at risk, have records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend, regularly review any alternative provision placements to make sure the placement continues to be safe and meets the child's needs. If safeguarding concerns occur, the any placement will be immediately reviewed and ended if necessary.

6. Supporting Students through Personal Development/ PSHE

It is vital that staff working with young people understand the above safeguarding issues (and any other relevant contextual issues) to allow them to be alert to and respond to signs and evidence of a concern. Staff also use this knowledge to plan what information needs to be communicated to students and parents/carers; DSLs work with RSE/PSHE coordinators and other relevant staff within each school to ensure students are taught about issues in a timely and age-appropriate manner through personal development/ PSHE lessons and opportunities. Children are supported to obtain and develop the knowledge and skills to keep themselves and others safe. Children are made aware the law is in place to protect them, rather than criminalise them. Staff know that students with Special Educational Needs may require additional support with their understanding during learning opportunities - please see our schools' RSE policies for more details. Various methods are used within each school to communicate to parents/carers how to help keep their child safe linked to current learning and/or emerging trends.

7. Procedures when there is a concern about a child

All staff members are encouraged to have the attitude 'it could happen here' where safeguarding is concerned. Where staff have a concern about a child's welfare. **All staff concerns relating to safeguarding or child protection must be placed on MyConcern**

All staff members have a duty to identify and respond to suspected/actual abuse or disclosures of abuse. Any member of staff, volunteer or visitor to the school who has a concern about a child, e.g. receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must** report it immediately to the DSL (or, in their absence, the deputy DSL). All records of concerns or referrals will be stored securely in compliance with relevant legislation.

Procedures for reporting concerns in each school will be publicised to all staff and visitors. Whilst some schools may ask that all urgent issues are reported to the DSL in person, all concerns must always then be followed up in writing as soon as possible using the relevant school reporting system, MyConcern.

When completing their write up, all staff should ensure records include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up/ resolved/ any action taken/ decisions reached/ outcomes.

The DSL will add further notes to this record.

If, for any reason, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Safeguarding contact details are displayed in the school to ensure that all staff members have unfettered access to safeguarding support, should it be required. Any individual may refer to social care where there is suspected or actual risk of harm to a child, and details of local key contacts are publicised in schools.

When new staff, volunteers, Academy Committee governors, Trustees, Members or contractors, or regular visitors join our school they are informed of the safeguarding arrangements in place, the name of the DSL and deputy DSL(s), and how to share concerns with them.

The DSL will make decisions whether to:

- Manage support for the child internally;
- Undertake an Early Help assessment, or
- Make a referral to statutory services, for example as the child could be in need or is suffering or likely to suffer harm.

Where there is risk of immediate harm, concerns will be referred by telephone to social care (Essex Children and Families Hub/Suffolk MASH), and/or the Police. Following a referral, Local Authorities may undertake statutory assessments under the Children Act 1989 which may result in a Section 17 assessment (Children in Need) or a Section 47 (a child suffering, or likely to suffer, significant harm). Less urgent concerns or requests for support will be referred as per the processes for the relevant authority. The school may also seek advice from social care or another appropriate agency about a concern, if we are unsure how to respond to it. Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents/carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the social care and/or Essex Police for advice on when to share information with parents/carers.

Should the police become involved with a child, schools will be alert to the need for a child to have an appropriate adult in line with PACE Code C.

Our schools work with key local partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support (through a 'child in need' or a 'child protection' plan, or assessments undertaken by a qualified lead practitioner before statutory intervention or including section 17).

With any safeguarding issue that arises, consideration will be given to the concept of significant harm where a child is suffering, or is likely to suffer, a degree of physical, sexual and/or emotional harm (through abuse or neglect) which is so harmful that there needs to be compulsory intervention by child protection agencies into the life of the child and their family. We will work with local partners in our referrals to justify compulsory intervention in family life if we feel this is in the best interests of children.

All action is taken in accordance with the following guidance:

- Essex Safeguarding Children Board guidelines - the SET (Southend, Essex and Thurrock) Child Protection Procedures (ESCB - updated via their live link: [Contents](#));
- Essex County Council;
- Suffolk Safeguarding Partnership guidance: [Child Protection — Suffolk Safeguarding Partnership](#);
- Keeping Children Safe in Education (DfE, 2026);
- Working Together to Safeguard Children (DfE, 2026);
- 'Effective Support for Children and Families in Essex' (ESCB, 2024);
- Police and Criminal Evidence Act 1984 (PACE) Code C

and other relevant guidance depending on the nature of the concern.

If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member concerned should press for re-consideration of the case with the DSL.

Work experience

Schools directly organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm. Relevant guidance around DBS, in line with Keeping Children Safe in Education 2026, applies. Before students attend any work experience, they are given advice about how to manage situations that may arise e.g. if they are asked to do anything that makes them feel uncomfortable or unsafe. They are also given advice as to what to do if they have any concerns whilst on their placement i.e. to report issues to the school or parents, or a manager at the placement if appropriate

8. Training

All staff members receive appropriate Level 2 annual child protection training (including Prevent, Online Safety, Filtering and Monitoring and Restrictive Intervention/Reasonable Force) which is then regularly updated and in line with advice from the Essex Safeguarding Children Board (ESCB) and Suffolk Safeguarding Partnership. This is undertaken at induction, or at the start of the academic year as part of the annual training. Staff also read Keeping Children Safe in Education Part 1, as well as being directed to read the Staff Code of Conduct. Staff with direct contact with

Children also read Annex A of KCSIE. As part of annual/induction training, all staff are made aware of the local Early Help processes.

All Academy Committee members and Trustees receive appropriate online Governor safeguarding training. This is undertaken at induction, or at the start of the academic year as part of the annual training. Governors and Trustees also receive a face-to-face training session annually with the Trust/School DSL on annual KCSIE updates and local arrangements. The DSL and deputy DSL(s) undertake level 3 child protection training at least every 2 years. At Penrose Learning Trust we have an expectation that each Headteacher, Link Safeguarding Governor and Link Safeguarding Trustee receive appropriate levels of training and this is done in line with DSL training. Records of any child protection training undertaken are kept for all staff and Governors. Each school follows an agreed minimal expectation of training.

The schools ensure that the DSL (and deputies) also undertake training in inter-agency working and other matters as appropriate.

DSLs (and deputies) attend regular update and networking sessions. At Penrose Learning Trust, we also ensure that we provide support from the Trust DSL, and supervision for staff through the use of qualified external staff.

As part of our wider duties, all staff also undertake annual allergy awareness training.

9. Professional confidentiality

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or students), or promise to keep a secret. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the designated safeguarding lead and may require further referral to and subsequent investigation by appropriate authorities. They must also ensure they only involve those who need to be involved.

Information on individual child protection cases may be shared by the DSL (or deputy) with other relevant staff members. This will be on a 'need to know' basis only and where it is in the child's best interests to do so. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

10. Records and information sharing

Sharing information is a key part of safeguarding work and we understand that decisions about how much information to share, with whom and when, can have a profound impact on a child's life. Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern held about a child or children within our school and when these records should be shared with other agencies.

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing information where there are real safeguarding concerns. Fears about sharing information cannot be allowed to stand

in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Generic data flows related to child protection are recorded in our records of processing activity and regularly reviewed; and our online school privacy notices accurately reflect our use of data for child protection purposes.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will record it as soon as possible in writing, noting what was said or seen (if appropriate, using a body map to record), giving the date, time and location. All records will be dated, and signed, and will include the action taken. This is then presented to the DSL (or deputy), who will decide on appropriate action and record this accordingly. Our schools all use electronic systems, and the same information is captured when concerns are raised, and all staff have their own account on the system.

Any records related to child protection are kept in an individual child protection file for that child (which is separate to the main pupil file). All child protection records are stored securely and confidentially and will be retained for 25 years after the pupil's/student's date of birth, or until they transfer to another school/educational setting.

Where a pupil/student transfers from our school to another school / educational setting (including colleges), their child protection records will be forwarded to the new educational setting, in line with statutory guidance that it is sent **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term. These will be marked 'Confidential' and for the attention of the receiving school's designated safeguarding lead, with a return address on the envelope so it can be returned to us if it goes astray. We will obtain evidence that the paperwork has been received by the new school and then destroy any copies held in our school. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving so appropriate support is in place when the child arrives, and particularly where the information would support an assessment of risk to others in the school as well as the individual pupil. This is also the case for any student on an off-site direction. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives or incidents that may indicate concerns about serious violence or harmful behaviours. Where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, it is incumbent on the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives.

Where a pupil/student joins our school, we will request child protection records from the previous educational establishment (if none are received).

Further guidance is available here: [Information sharing advice for safeguarding practitioners](#)

Our school is signed up to the Education and Learning Information Sharing Protocol which includes information sharing for safeguarding purposes. This protocol enables us to share and receive information with the Local Authority in a legal, safe, and secure way, to support our work in keeping children safe.

11. Interagency working

It is the responsibility of the DSL to ensure that the school is represented at, and that a report is submitted to, any child protection conference called for children on the school roll or previously

known to them if requested. Where possible and appropriate, any report will be shared in advance with the parent(s)/carer(s). The member of staff that attends will be fully briefed on any issues or concerns the school has and be prepared to contribute to the discussions at the conference.

If a child is subject to a Child Protection or a Child in Need Plan, the DSL will ensure the child is monitored regarding their school attendance, emotional well-being, academic progress, welfare and presentation. If the school is part of the core group, the DSL will ensure the school is represented, provides appropriate information and contributes to the plan at these meetings. Any concerns about the Child Protection Plan and/or the child's welfare will be discussed and recorded at the core group meeting, unless to do so would place the child at further risk of significant harm. In this case the DSL will inform the child's key worker immediately and then record that they have done so and the actions agreed. Schools also contribute to MARACs as required and can receive notifications from Operation Encompass regarding Domestic Violence/Abuse.

As necessary, the school will work with Virtual School Heads for any child with a social worker, including Looked After or Previously Looked After children, to promote their educational attendance, attainment and progress. The designated teacher in will be supported by the DSL. There will be liaison with Personal Advisors for any care leavers.

Private fostering

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. Where the arrangements come to the attention of the school or college (and the school is not involved in the arrangements), the school will notify the Local Authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools who are involved (whether or not directly) in arranging for a child to be fostered privately must notify Local Authorities of the arrangement as soon as possible after the arrangement has been made. Notifications will contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing; the statutory guidance can be found [here](#).

12. Supporting students at risk

Our schools recognise that children are on different journeys and some may need a broad range of support or increased levels of support. Each school has an effective pastoral structure to enable a variety of support opportunities to be accessed.

Penrose Learning Trust schools will endeavour to support students through, for example:

- a) The curriculum to encourage self-esteem and self-motivation;
- b) The school ethos which promotes a positive, supportive and secure environment and which gives all students and adults a sense of being respected and valued;
- c) The implementation of the school's rewards and behaviour policies;
- d) A consistent approach agreed by all staff which will endeavour to ensure the student knows that some behaviour is unacceptable, but s/he is valued;
- e) Regular liaison with other professionals and agencies who support the students and their families;

- f) A commitment to develop productive, supportive relationships with parents /carers wherever possible;
- g) The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in child protection situations;
- h) Recognition that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse, so staff who work in any capacity with children with profound and multiple disabilities, sensory impairment and/ or emotional and behavioural problems will need to be particularly sensitive to signs of abuse;
- i) Recognition that in a home environment where there is domestic violence, drug or alcohol abuse, children may also be vulnerable and in need of support or protection;

Please see section 17 of this policy for information around support for mental health.

All children, without exception, have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs. Each school carefully considers how they are supporting their students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. We understand for example that children who are LGBT or who are perceived to be can be targeted by other children. We endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. We also ensure our PSHE curriculum promotes British Values, and that students understand their rights and responsibilities in regard to protected characteristics.

DSLs support children and families and channels any needs or concerns to appropriate agencies, using the guidance and the capturing of student voice to consider whether a referral to the police is necessary. Staff use student files to look for any concerning trends in terms of problematic behaviour, and SENCOs will provide additional support as necessary where it is recognised students with SEND may face additional challenges with safeguarding issues. We aim to respond swiftly to any issues within our schools and proactively plan the curriculum to manage their needs. We ensure that training for staff, children, families and governors reflects the need and make-up of our community.

We develop a safe and open culture within our schools to ensure and promote students feeling comfortable to talk to staff and have regular opportunities to discuss issues with our pastoral teams.

13. Safeguarding Children with Medical Conditions and Allergies

The school policy on Supporting Children with Medical Conditions and the Trust Allergy and Anaphylaxis Policy set out the measures taken to support children with medical conditions and allergies. Staff should recognise that concerns relating to a child's medical needs may, in some circumstances, have a safeguarding dimension, including where there are concerns about medical neglect, barriers to accessing appropriate treatment, or where the nature of a child's presentation gives rise to safeguarding concerns.

In the event of a clinical incident taking place in a school or college, the responsible healthcare professional should work with the DSL to determine whether safeguarding procedures should be followed and whether any further action is required based on the nature of the incident. Any safeguarding concerns arising from a child's medical needs should be managed in accordance with the school's child protection procedures.

A child's emotional wellbeing will be considered as part of their Individual Healthcare Plan alongside their medical needs.

14. Children who are Questioning their Gender

Should a child or parent make a request around social transition, this will be considered on a case-by-case basis in conjunction with the DSL. In making decisions about supporting social transition, schools and colleges must comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children. The first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes. The school will consider the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. The school will work with parents/carers to consider the request (unless doing so is deemed to place the child at greater risk of harm) seeking advice from relevant professionals as required.

In accordance with the School Premises (England) Regulations 2012 and draft KCSIE guidance, pupils must not be permitted to use toilet facilities designated for the opposite biological sex. Schools and colleges must not allow a child aged 11 years or older at the start of the school year to undress in the presence of a child of the opposite biological sex. Where a child does not wish to use facilities designated for their biological sex, the school will consider whether suitable alternative arrangements, such as individual self-contained facilities, can be provided without compromising the safety, privacy, dignity and wellbeing of any child. Where schools have implemented single-sex sports as being necessary for safety and/or fairness, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite biological sex. Where residential or overnight accommodation is provided, arrangements will comply with applicable statutory requirements and draft KCSIE guidance relating to biological sex and safeguarding. In line with current KCSIE proposals, the school will maintain accurate records of a child's biological sex wherever sex is recorded for safeguarding and statutory purposes. The DSL will be clear with the child around which aspects of social transition cannot be accommodated.

Children who are questioning their gender may be particularly vulnerable to child-on-child abuse, bullying, harassment, exploitation, isolation, poor mental health, online influences or family conflict. Staff should remain alert to these risks and respond in accordance with safeguarding procedures, taking action as necessary.

15. Restrictive Intervention, including use of reasonable force

The school will always seek to prevent situations from escalating through proactive strategies, support and de-escalation. However, where force is necessary, it will be used in accordance with DfE guidance, [Restrictive intervention, including use of reasonable force, in schools](#). All members of school staff have a legal power to use reasonable force in certain circumstances:

To prevent or stop a pupil from:

1. causing injury to themselves or others
2. committing a criminal offence
3. damaging property
4. causing disorder among pupils at the school, whether during a teaching session or otherwise

The term 'reasonable force' covers the broad range of actions from staff that involve a degree of physical contact with pupils. Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking

up a fight or where a pupil needs to be restrained to prevent violence or injury. Staff will use no more force than is needed.

Headteachers and authorised staff can also use such force as is reasonable to search for legally prohibited items, not those otherwise banned by the school (as outlined in each school's behaviour policy). If a pupil refuses to co-operate with a search for prohibited items, staff will assess whether the use of reasonable force is necessary, proportionate and lawful in the circumstances. Any use of reasonable force will be judged against the circumstances at the time and will take account of the age, understanding, medical conditions, SEND and individual needs of the pupil.

Seclusion, defined as a non-disciplinary intervention involving keeping a pupil confined to a place away from others and preventing them from leaving, may only be used in exceptional circumstances as a protective measure where there is an immediate and significant risk of harm to the pupil or others, and where alternative strategies have been unsuccessful, would not be appropriate, or cannot reasonably be implemented because of the urgency of the situation.

There are appropriately trained staff in all Penrose Learning Trust Schools. Further information will be available in the school's Restrictive Interventions policy.

16. Mobile Phones

As outlined in the schools' behaviour policies, our schools operate as mobile phone-free environments by default. This approach recognises and is intended to reduce the safeguarding risks associated with mobile phone use, including access to social media and the potential for child-on-child abuse and other forms of harm. More detail can be found in the schools' behaviour policies.

17. Promoting positive mental health and resilience in school

Positive mental health is the concern of the whole community, and we recognise that schools play a key part in this. Penrose Learning Trust wants to develop the emotional wellbeing and resilience of all students and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to counter balance and promote further growth of resilience. Penrose Learning Trust places an important emphasis on supporting mental health across our schools and are committed to supporting students, staff, parents/carers, and communities.

All staff across Penrose Learning Trust are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, 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. Across Penrose Learning Trust schools, we ensure that all staff have training on mental health, with each school having a Senior Mental Health Lead with appropriate training.

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

Where staff have a mental health concern about a child, they should follow the child protection procedures and raise the issue by informing the DSL or a deputy via my concern.

It is vital that we work in partnership with parents/carers to support the well-being of our students. Parents/carers should share any concerns about the well-being of their child with school, so appropriate support and interventions can be identified and implemented.

18. Allegations about members of the workforce

All staff members are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the code of conduct.

The school works in accordance with statutory guidance and the SET procedures (ESCB) and Suffolk Safeguarding Partnership expectations in respect of allegations against an adult working with children (in a paid or voluntary capacity), including supply staff, trainee teachers, volunteers and contractors.

Schools have processes in place for reporting any concerns about a member of staff (or any adult working with children). See Appendix 1 for information on how to share low level concerns, which must be done in a timely manner.

- Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay (or where that is not possible, to the deputy headteacher). This role is distinct from the DSL as the named person should have sufficient status and authority in the school to manage employment procedures. Staffing matters are confidential, and the school must operate within statutory guidance around data protection.
- Any concerns about the Headteacher should go to the Chair of Academy Committee; the CEO should also be informed.
- A concern about the Trust CEO should be reported to the Chair of the Trust.
- Should a low-level concern be shared about supply staff, trainee teachers and contractors, the school will notify their employers, so that any potential patterns of inappropriate behaviour can be identified.
- A concern about an Academy Committee member should be reported to the Headteacher of the school in which the allegation arose. The Headteacher will also inform the CEO.
- A concern about a Trust member of staff should be reported to the Headteacher of the school in which the allegation arose. The Headteacher will also inform the CEO.
- A concern about a Trustee or Member should be reported to the CEO, who will also inform the Chair of the Trust.

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business. Where this applies, schools share safeguarding responsibilities with the employment agency or business. Schools and colleges remain responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency or business, which will usually lead on any disciplinary action.

In the event of any allegation, a case manager will be appointed to investigate. Non-recent concerns will be responded to in the same way as all other concerns. Where necessary, referrals may be made to children's social care and in emergencies, the police.

At Penrose Learning Trust we recognise the possibility that adults working in the school may harm children, including Governors, Trustees, Members, volunteers, supply staff, trainee teachers, contractors, and agency staff. There is an additional Trust policy around procedures for dealing with safeguarding allegations against adults in school. The guidance in KCSIE (Part Four) should be followed where allegations are made.

SET procedures (ESCB) and Suffolk safeguarding partnership guidance require that, where an allegation against a member of staff is received, the Headteacher, senior named person, or the Chair of Academy Committee/Trust must inform the duty Local Authority Designated Officer (LADO) in the Children's Workforce Allegations Management Team on **03330 139 797 (Essex) / 0300 123 2044 (Suffolk)** within one working day. However, wherever possible, contact should be made immediately as the LADO will then advise on how to proceed and whether the matter requires police involvement. This will include advice on speaking to students and parents/carers, and HR. The school will not carry out any investigation before speaking to the LADO.

Should schools receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children, the school will follow their normal safeguarding policies and procedures, including informing the LADO.

19. Whistleblowing

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example students in the school or members of the public.

All staff members and the wider community should be able to raise concerns about poor or unsafe practice and feel confident that any concerns will be taken seriously by the school and Board of Trustees. As such, staff are made aware of the duty to raise concerns about the attitude or actions of staff in line with the school's code of conduct/Trust's whistleblowing policy.

We want everyone to feel able to report any child protection / safeguarding concerns. However, for members of staff who feel unable to raise these concerns internally, they can call the NSPCC whistleblowing helpline on: 0800 028 0285 (line is available from 8:00am to 8:00pm, Monday to Friday, and 9.00am to 6pm at weekends) or email: help@nspcc.org.uk.

Parents/carers or others in the wider school community with concerns can contact the NSPCC general helpline on: 0808 800 5000 (24 hour helpline) or email: help@nspcc.org.uk.

20. Safeguarding Requirements Relating to School Premises

Where school premises are used by external organisations, including for lettings, community activities, after-school provision, holiday activities or tuition, appropriate measures will be taken to promote the safety and welfare of children in accordance with KCSIE 2026 and relevant government guidance relating to out-of-school settings: [Keeping Children Safe in Out of School Settings](#).

The school will ensure that appropriate arrangements are in place in relation to:

- premises safety and risk assessments;
- site security, supervision and the management of access to the school site;
- the approval and monitoring of lettings and third-party users;
- communicating safeguarding expectations and codes of conduct to organisations using school facilities;
- seeking assurance, where appropriate, that organisations providing activities for children have suitable safeguarding policies, procedures and recruitment practices in place, including appropriate vetting and barring checks;
- ensuring that any safeguarding concerns arising during the use of school premises are reported promptly to the DSL and managed in accordance with the school's child protection procedures; and
- escalation and referral to children's social care, the police or other agencies where concerns indicate that a child may be suffering, or is likely to suffer, significant harm.

External organisations remain responsible for the conduct and management of their own staff and volunteers; however, the school/Trust retains a safeguarding duty in relation to concerns arising on its premises and will take appropriate action where children may be at risk. Where a safeguarding concern or allegation relates to an adult working or volunteering for an organisation using school premises, the school will ensure that the concern is managed in accordance with the Trust's procedures for allegations against adults working with children. This includes consultation with, or referral to, the Local Authority Designated Officer (LADO), where the allegation meets the relevant threshold. The school will work with the organisation concerned and relevant agencies to ensure appropriate action is taken to safeguard children.

The schools/Trust recognises their responsibilities under the Terrorism (Protection of Premises) Act 2025 (Martyn's Law), as applicable. Appropriate arrangements will be in place to consider protective security and preparedness measures in relation to the use of school premises, including by third-party users. Relevant staff and organisations using school facilities will be expected to cooperate with site security, emergency and evacuation procedures, and any concerns relating to the safety or security of the premises will be reported and escalated in accordance with Trust procedures.

The school's separate lettings and premises hire procedures set out the operational arrangements and responsibilities for managing the use of school premises by external organisations.

HIGHLY CONFIDENTIAL

Record of Allegation

Name of employee/ supply staff/ volunteer	
Position held	
Name of person completing this form	
Position held	

Summary of allegation(s):
(Including date(s) and contextual information)

Initial action taken and decisions reached:

How allegation was followed up and by whom:
(Including date and membership of any consultations and meetings held)

Outcome of investigation: *
(Including rationale)

If applicable, outcome of any formal disciplinary hearing (including date of outcome letter sent to employee - copy of which must be sent to the LADO):

If applicable, the outcome of any formal appeal hearing (including date of outcome letter sent to employee - copy of which must be sent to the LADO).

Determination of outcome by LADO (please tick)

Substantiated	
False	
Unsubstantiated	
Unfounded	

Date employee written to by school to advise of determination by LADO (if allegation has met LADO threshold)

Where a case meets the threshold for DBS referral (and if applicable TRA referral) date referral was made

Employee Comments:

Signed / Dated:

Headteacher :

Date:.....

Employee :

Date:

A copy of this form should be sent to the LADO using the following email address
LADO@suffolk.gov.uk

A copy of this form should be retained confidentially on the personnel file for the individual for the employee until they have reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Appendix 2

HIGHLY CONFIDENTIAL

Record of low-level concern

Name of employee/ supply staff/ volunteer	
Position held	
Name of person completing this form	
Position held	

Summary of low-level concern(s):
(Including date(s) and contextual information)

Initial action taken and decisions reached:

How low-level concern was followed up and by whom:
(Including date and membership of any consultations and meetings held)

Outcome of investigation: *
(Including rationale)

If applicable, outcome of any formal disciplinary hearing (including date of outcome letter sent to employee):

If applicable outcome of any formal appeal hearing (including date of outcome letter sent to employee).

For low-level concerns, if the concern(s) relate to misconduct or poor performance, is the individual aware this information will be referred to in any future reference? Yes / No (NB references must be factual and not contain opinion)