



Safeguarding and Child Protection Policy

This policy sets out Innovate2Educate Partnership's Trust-wide arrangements for safeguarding and promoting the welfare of children, together with the local procedures each school must apply.

This policy was approved as follows:

Approver:	Board of Trustees	Date:	TBC
Owner:	Education / Safeguarding	Version:	V1 Final Draft
LAC adoption date:	14.10.26	Review frequency:	Annually
School name:	Picknalls First School		

Status: Statutory / Mandatory Trust policy Next review: September 2027

This policy applies to all Innovate2Educate Partnership schools, pupils, employees, agency staff, volunteers, contractors, Trustees and local governors. School-specific safeguarding contacts and operational arrangements must be completed locally where highlighted.

Document History

Version	Version Date	Author	Summary of Changes
V1 Draft	September 2026	Education / Safeguarding	Final legislative review completed. Updated for the Crime and Policing Act 2026, including regulated activity, mandatory reporting of child sexual abuse, criminal exploitation and technology-facilitated sexual harm. Children's Wellbeing and Schools Act 2026 provisions retained. Named Trust safeguarding responsibilities added for Stuart Harper (Trustee), Kerry Rochester (CEO) and Helen Major (Trust Safeguarding Lead).

Policy governance

The Board of Trustees is the proprietor of all i2e academies and retains strategic responsibility for safeguarding. Local Academy Committees support local assurance and monitoring in accordance with the Trust Scheme of Delegation. Headteachers are responsible for implementing this policy in their school, supported by the Designated Safeguarding Lead (DSL) and Deputy DSL(s).

The policy must be reviewed at least annually and whenever statutory or local safeguarding guidance changes. Schools must keep their local contact details and operational arrangements up to date throughout the year.

School-specific safeguarding contacts

Role	Name / contact	Training / date
Trust Safeguarding Trustee / Senior Board-Level Safeguarding Lead	Stuart Harper	TBC
Chief Executive Officer (CEO)	Kerry Rochester (k.rochester@i2e.org.uk)	1 st /7 th September 2026
Trust Safeguarding Lead	Helen Major	DSL September 2026
Headteacher	Anne Tapp	Level 4 Sept 24 (due Autumn 26)
Designated Safeguarding Lead (DSL)	Anne Tapp	Level 4 Sept 24 (due Autumn 26)
Deputy Designated Safeguarding Lead(s) (DDSL)	Angela Jones Stephanie Fenton Reneta Milward	Level 4 Sept 24 (due Autumn 26)
Safeguarding Link Governor	Mark Underwood	Level 1 Autumn 26
Chair of Local Academy Committee	Paul Johnson	Previous Level 1 Feb 23
Designated Teacher for Looked After/Previously Looked After Children	Stephanie Fenton	Level 4 Sept 24 (due Autumn 26)
Prevent Lead	Anne Tapp	Level 4 Sept 24 (due Autumn 26)
Senior Mental Health Lead	Julia Simon	Level 1 1.9.26
PSHE/RSHE Lead	Anne Tapp	Level 4 Sept 24 (due Autumn 26)
SENCO	Stephanie Fenton	Level 4 Sept 24 (due Autumn 26)
Attendance Lead	Julia Simon	Level 1 1.9.26
Filtering and Monitoring SLT Lead	Anne Tapp	Level 4 Sept 24 (due Autumn 26)
Filtering and Monitoring Link Governor	Mark Underwood	Level 1 Autumn 26

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Current statutory and national guidance

1. Purpose and aims

The purpose of our Safeguarding policy is to ensure that we:

- Are committed to developing a robust safeguarding culture of vigilance and challenge.
- Build resilience by raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe.
- Establish a safe environment in which children can learn and develop within an ethos of openness and where children are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- Support vulnerable pupils who have been abused, have witnessed violence towards others or may be vulnerable to abuse.
- Prevent unsuitable people from working with children by ensuring we practice safe recruitment in checking the suitability of all school staff, supply staff and volunteers to work with our children and maintain an active, ongoing vigilance in line with the safeguarding culture.

We follow the procedures set out by Staffordshire Safeguarding Children's Partnership, and by knowing and understanding that:

- Safeguarding and promoting the welfare of children is everyone's responsibility and the voice of the child is evident.
- Everyone who comes into contact with children and their families has a role to play.
- Everyone should ensure that their approach is child-centered considering, at all times, what is in the best interests of the child.
- By establishing a safe environment, we enable our children to learn and develop within an ethos of openness.
- No single practitioner can have the full picture of a child's needs and circumstances.
- The importance of providing children with a balanced curriculum including PHSE, healthy relationship education, online safety, making or sharing of nudes or semi-nudes, child-on-child abuse (including harassment and violence) as well as 'abuse outside the home' (County Lines, Child Criminal Exploitation incl Child Sexual Exploitation and other contextualised safeguarding issues). Also supporting this with online activities, enabling children to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Undertaking the role to enable children and young people at our school to have best outcomes.
- Ensuring that we have awareness of our staff's knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our practice.

Our role is to:

- Provide help and support to meet the needs of children as soon as problems emerge
- Protect children from maltreatment, inside or outside the home, including online.
- Prevent impairment of our children's mental and physical health or development.
- Ensure that our children grow up in circumstances consistent with the provisions of safe and effective care.
- Take action to enable ALL children to have the best outcomes.

This policy provides guidance to all adults working within the school, whether paid, voluntary or employed by a third party, and should be read in conjunction with Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and the Staffordshire Safeguarding Children Partnership procedures.

This policy is available on our website and on request from the main office. We will also inform parents/carers about this policy when their children join our school.

This policy will be reviewed in full by the Trust Board and, where delegated, the Local Academy Committee on an annual basis or sooner should legislation/guidance change.

This policy sets out how the Trust Board and, where delegated, the Local Academy Committee discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at this school. Our policy applies to all staff; paid and unpaid, working in the school, including Governors.

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

The Trust Board, working with the CEO, Headteachers and Designated Safeguarding Leads, ensures that all staff, including those who do not work directly with children, read Part One of KCSIE 2026 in full.

The school follows the Staffordshire Safeguarding Children's Partnership policies and procedures.

2. Our ethos and culture at Picknalls First School

At Picknalls First School, our children's welfare is of paramount importance to us, and we are a child-centred setting. Our children are reassured that they have a voice, will be listened to, and what they say will be taken seriously. They know that they will be supported and kept safe. They will never be given the impression that they are creating a problem by reporting abuse.

Children are encouraged to talk freely with staff if they are worried or concerned about something, and our staff understand that a victim of any type of abuse should never feel ashamed for making a report. Their views and wishes will inform any assessment and provision for them.

We make every effort to listen to and capture the voice of children to enable us to have a clear understanding of their daily lived experiences. This includes understanding that the child's presenting behaviours and observations by staff also form part of their voice.

We are 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. They may feel embarrassed, humiliated or threatened. This could be due to vulnerability, disability and/or sexual orientation or language barriers.

This does not prevent ALL staff from using professional curiosity and speaking to the DSL if they have concerns about a child. Our staff determine how best to build trusted relationships with children which facilitate this communication.

We understand our statutory duty to safeguard and promote the welfare of children, and we maintain a professional attitude of 'it could happen here' where safeguarding is concerned. We expect ALL staff, governors, volunteers, and visitors to share our commitment, maintaining a safe environment and a culture of vigilance.

Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused, neglected or exploited. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. We work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours, and these are dealt with appropriately and robustly. Staff do not accept these behaviours as 'banter', 'having a laugh' or 'part of growing up'.

All staff are encouraged to report concerns that they have and not to see these as insignificant. They will act on them immediately and report them to the DSL/DDSL.

Options of support will include:

- managing any support for the child internally via our own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment
- making a referral to statutory services, for example, as the child could be in need, is in need or is suffering, or likely to suffer harm.

When dealing with safeguarding matters, we are conscious of the language and terminology we use, especially in front of children. Sometimes reference is made to a child who has been subjected to abuse, as a victim. However, not all children consider themselves a victim, nor will they want to be referred to in this way. We are conscious of this, and when managing any incident, we will be prepared to use terminology that children are most comfortable with.

In KCSIE 2026 guidance, reference is made to alleged perpetrator and perpetrator; however, we will try to avoid using these terms, and instead we will refer to children and young people who have 'displayed' or 'instigated' particular behaviours. We ensure that all children involved receive support.

We work closely with safeguarding partners, share the same goals, learn with and from each other, have what we need to help families, acknowledge and appreciate difference as well as challenging each other.

We acknowledge the four principles that as professionals, we should follow when working with parents and carers:

- effective partnership and the importance of building strong, positive, trusting and co-operative relationships
- respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers
- empowering parents and carers to participate in decision-making by equipping them with information, keeping them updated and directing them to further resources
- involving parents and carers in the design of processes and services that affect them.

We recognise the stressful and traumatic nature of safeguarding work, and support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate, this could take the form of clinical supervision.

3. Legislation, guidance and links to other school policies

This policy has been devised with due regard for statutory guidance from the Department for Education, including Keeping Children Safe in Education 2026 (KCSIE), and should be read alongside:

- Working Together to Safeguard Children 2026
- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026, including the changes to regulated activity with children and the statutory framework for reporting child sexual abuse
- Staffordshire Safeguarding Children Partnership policies, procedures and the Right Help, Right Time framework
- What to do if you are worried a child is being abused: advice for practitioners
- Prevent duty guidance: guidance for specified authorities in England and Wales
- Working Together to Improve School Attendance
- Children Missing Education: statutory guidance for local authorities and schools
- DfE filtering and monitoring standards for schools and colleges
- DfE guidance on generative artificial intelligence in education
- Information sharing: advice for practitioners providing safeguarding services, and any successor statutory information-sharing guidance
- Early Years Foundation Stage statutory framework, where applicable
- Staff Code of Conduct, Behaviour Policy, Online Safety Policy, Attendance Policy, Allergy Safety Policy, Whistleblowing Policy, Safer Recruitment procedures and other relevant i2e Trust policies.

4. The role of all staff in keeping children safe

All staff have read and have a good understanding of Part One of Keeping Children Safe in Education 2026 in full and are aware of the safeguarding links to other policies relating to their daily practice.

All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, including the DfE filtering and monitoring standards). This training takes place at induction and is regularly updated. In addition, all staff receive safeguarding (including online safety) updates through staff briefings, safeguarding bulletins, training and other agreed communication routes as required, and at least annually, to continue to provide staff with the relevant skills and knowledge to safeguard children effectively.

All staff know who the DSL/DDSL is and understand that as well as being the expert in this field, they are there to support staff, volunteers, and the Trust Board and, where delegated, the Local Academy Committee.

All staff are aware of their responsibility to provide a safe environment in which children can learn.

All staff are aware of indicators of abuse, neglect, exploitation and modern slavery and understand that children can be at risk of harm inside and outside of our school, inside and outside of their home and online. Staff are confident in exercising professional curiosity and understand that knowing what to look for is vital for the early identification of abuse, neglect and exploitation, to identify cases of children who may need our help or protection. They are aware that abuse, neglect, and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple harms do overlap one another.

All staff, but especially the DSL/DDSL, consider whether children are at risk of abuse or exploitation in situations outside their families. 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.

All staff recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences can have a significant impact on a child's welfare, wellbeing, mental health, sense of belonging and willingness to seek help. Concerns relating to prejudice-based harm will be considered within safeguarding practice where appropriate and responded to in line with this policy.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse and other risks online as well as face-to-face. They know that in many cases abuse and other risks will take place concurrently both online and offline.

Children can also abuse other children online; this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. This includes AI generated child sexual abuse material.

All staff are also mindful that disinformation, misinformation and conspiracy theories can be an online safety risk/concern.

All staff know what to do if a child tells them they are being abused, exploited, or neglected. Staff know how to maintain an appropriate level of confidentiality by only involving those who need to be involved, such as the DSL/DDSL and local authority children's social care. Staff never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child. They are aware of their statutory reporting responsibilities and duty in relation to FGM.

The Crime and Policing Act 2026 establishes a statutory duty for adults engaged in relevant activity with children to report specified child sexual abuse to the police or a relevant local authority when the duty is in force. The Trust will implement this duty from its commencement date and in accordance with statutory guidance issued under the Act. Until then, and thereafter alongside the statutory duty, all staff must continue to report any concern or disclosure of child sexual abuse immediately to the DSL/DDSL and follow this policy without delay.

All staff know how to reassure children that they are being taken seriously and that they will be supported and kept safe. A child should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a child ever be made to feel ashamed for making a report.

All staff are aware of the early help process and understand their role in it and are confident to identify and support children who may benefit from early help, effectively giving children and their families the right help at the right time.

All staff are aware of the local arrangements for community-based Family Help and targeted early help, how to identify when a child or family may benefit from support, and when concerns should be referred to children's social care. Staff understand the statutory pathways under sections 17, 20, 31 and 47 of the Children Act 1989, know how to make a referral to children's social care and understand their potential role in assessments and multi-agency work.

All staff understand their responsibility to report concerns about the behaviour of any adult in our school and know that they will be listened to and taken seriously.

All staff understand their responsibility to escalate concerns and 'press for reconsideration' if they believe a child's needs remain unmet or if the child is failing to thrive and in need or if the child is at risk of harm.

5. The role and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead(s)(DDSL)

Trust requirement: the DSL and DDSL(s) must be trained to the same appropriate level, with formal training refreshed at least every two years and knowledge/skills refreshed at least annually. The Trust Safeguarding Lead, Helen Major, will support consistency and professional development across i2e schools.

For full details of the DSL/DDSL roles and responsibilities, please refer to Part Two and Annex B of Keeping Children Safe in Education 2026.

Our DSL takes the lead responsibility for safeguarding and child protection (incl online safety as well as an understanding of the expectations, applicable roles and responsibilities in relation to the filtering and monitoring systems and processes in place, including requirements relating to the safe use and filtering of generative AI), and this is explicit in their job description.

As part of online safety, we are aware of our responsibility for information security and access management, and we will ensure that we have the appropriate level of security protection procedures in place to safeguard our systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. We will take appropriate action to meet the Cyber security standards for schools and colleges in order to improve our resilience to cyber-attacks.

During term time, the DSL/DDSL is available (during school hours) for staff in the school to discuss any safeguarding concerns. The DSL can delegate activities to the DDSL(s); however, the ultimate responsibility remains with them, and this lead responsibility is not delegated.

To ensure continuity of safeguarding responsibilities, when the DSL is unavailable due to illness, leave, or other circumstances, we implement robust cover arrangements with the other 3 DDSL's for these periods to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

The DSL acts as a source of support, advice, and expertise for staff. Risk assessments/safety plans will be completed as required and should, where appropriate, involve other agencies, these are reviewed regularly and shared appropriately.

Our DSL maintains robust systems to monitor and record the safeguarding training of all staff. Update and refresher timescales are evident within the training record. Training is delivered in line with Staffordshire Safeguarding Children Partnership procedures and KCSIE 2026. DSL/DDSL training includes Prevent awareness, local referral pathways, online safety, filtering and monitoring, information sharing, multi-agency working and the responsibilities set out in Annex B of KCSIE 2026.

The DSL ensures that all staff and regular visitors have appropriate safeguarding training to equip them for their role in school. This includes training on how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information accurately. The DSL ensures systems are in place to induct new staff/governors and that they are robust and monitored and any non-compliance shared with Senior Leadership Team/Trust Board and, where delegated, the Local Academy Committee.

The DSL monitors the safeguarding management system to record concerns about children, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storage of information comply with the data protection laws. Throughout this policy, the term 'data protection laws' refers collectively to the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.

The safeguarding records are kept in a secure location and away from academic records. There is a robust process of the transfer, both in and out, of these records and clear recording of this. (see information sharing section for further details).

When a parent chooses to remove their child/ren from school to receive Elective Home Education (EHE), the DSL will pass on any safeguarding concerns and the safeguarding file, if there is one, to Staffordshire County Council's Elective Home Education Team (electivehomeeducation@staffordshire.gov.uk) and inform other professionals who may be involved with that child.

The DSL/DDSL monitors the quality of safeguarding files through auditing case files regularly. Appropriate and regular case supervision takes place with the DSL and may be extended to other members of staff if we deem this appropriate.

The DSL/DDSL will refer cases of suspected abuse to the local authority children's social care, as required, and support other staff to make these referrals.

The DSL/DDSL understand the importance and need for attendance at Child Protection Case Conferences (both Initial and Review) and core group meetings as well as Child in Need meetings. The DSL/DDSL will represent education at these meetings and prior to conference, whether attending or not, MUST complete the Education Report prior to the Conference.

Any staff member may be required to be part of strategy discussions with other interagency meetings and contribute to the assessment of child/ren.

The DSL/DDSL will notify children's social care if a child with a child protection plan is absent for more than two days without explanation.

The DSL/DDSL helps to promote educational outcomes by sharing appropriate information about the welfare, safeguarding and child protection issues that children (including children with or who have previously had a Social Worker) are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the schools and their staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for these children including supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make.

The DSL has a good understanding of the community the school serves, the risks and its resilience.

6. Trust Board and Local Academy Committee responsibilities

The CEO and/or Chair of the Trust Board, in accordance with the Trust allegations procedure has attended appropriate training for dealing with safeguarding concerns or allegations made about, or concerns raised in relation to teachers, (including supply teachers and trainee teachers), other staff, volunteers, and contractors. They have read and understand Part 4 of KCSIE 2026 including Section One: Concerns or allegations that may meet the harm threshold and Section Two: Concerns or allegations that do not meet the harm threshold (low-level concerns).

The Trust Board and, where delegated through the Trust Scheme of Delegation, the Local Academy Committee have strategic leadership responsibility for safeguarding arrangements and must ensure that the Trust and school comply with their duties under legislation. They must have regard to KCSIE 2026 in ensuring that policies, procedures and training are effective and comply with the law. See Part Two: The Management of Safeguarding in KCSIE 2026. The Headteacher ensures that policies and procedures adopted by the Trust Board are understood and followed by all staff.

The Trust Board has appointed Stuart Harper, Trustee, as the Senior Board-Level Safeguarding Lead. He provides strategic oversight, challenge and assurance on behalf of the Board and works with the CEO, Kerry Rochester, the Trust Safeguarding Lead, Helen Major, Headteachers and DSLs, while preserving the operational responsibilities of school leaders and DSLs.

The Trust and its schools will provide staff with appropriate opportunities to contribute to and shape safeguarding arrangements and the child protection policy, including through training, review activity, safeguarding feedback and lessons learned from practice.

The Trust Board and, where delegated, the Local Academy Committee ensure that all staff, including Trustees and local governors, receive appropriate safeguarding and child protection training (including online which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. This training will equip Trustees and local governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding and this training is regularly updated.

Our Trust Board (as proprietor), supported by Local Academy Committees ensure that online safety is a running and interrelated theme when devising and implementing our whole school approach to safeguarding. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

The Trust Board and, where delegated, the Local Academy Committee will have regard to current DfE guidance on generative AI and associated safeguarding and online-safety risks.

In considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our Trust Board and, where delegated, the Local Academy Committee will ensure that our school has appropriate filters and a monitoring system in place. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The Trust Board and, where delegated, the Local Academy Committee ensure that appropriate cyber-security arrangements are in place and reviewed regularly, in line with current DfE cyber-security standards for schools and colleges.

The Trust Board and, where delegated, the Local Academy Committee are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and local multi-agency safeguarding arrangements. Further guidance is set out in Keeping Children Safe in Education 2026 and Equality Act 2010: advice for schools.

We play a crucial role in preventative education preparing children for life in modern Britain creating a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.

We have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the behaviour policy and pastoral support system, as well as by a planned programme of evidence-based Relationships and Health Education / Relationships, Sex and Health Education (RHE/RSHE), as appropriate to phase, delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Through our curriculum, children are supported to develop positive relationships, body confidence and self-esteem, and are taught about online harms, including the sharing of images, pornography, deepfakes, misogynistic influencers and where to seek help and support.

Whilst it is essential that the Trust Board, as proprietor, ensures that appropriate filtering and monitoring systems are in place, over-blocking must not create unreasonable restrictions on teaching, learning or access to safeguarding information.

Each school will undertake and record an annual online-safety review, informed by its context, pupil needs, emerging technologies and safeguarding risks. This review will complement, but not replace, the annual review of filtering and monitoring arrangements.

The Trust Board and, where delegated, the Local Academy Committee will ensure compliance with the completion of the Local Authority annual safeguarding audit, via the Phew electronic system, to the Local Authority and that any areas of concern in safeguarding are identified and a safeguarding action plan is developed.

Our school also completes a trust-wide safeguarding audit; however, this audit complements and does not replace the statutory return to the local safeguarding partnership.

The Trust Board and, where delegated, the Local Academy Committee ensure that those involved with the recruitment and employment of staff to work with children have received safer recruitment training and are compliant with safer recruitment procedures. This includes the requirement for appropriate checks to be carried out in line with national guidance. When candidates have been shortlisted, they will be made aware that online searches will be carried out. Part 3 Safer Recruitment.

Our Trust Board/Headteacher have ensured that there is a current whistleblowing policy, and staff are aware of this policy and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice, and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures.

Further guidance on whistleblowing is available through the Trust Whistleblowing Policy. The NSPCC Whistleblowing Advice Line is available to staff who do not feel able to raise safeguarding failures internally: 0800 028 0285 (8 am to 8 pm, Monday to Friday).

When the Trust Board and, where delegated, the Local Academy Committee or Proprietors hire/rent out school facilities/premises to organisations or individuals (e.g. community groups, sports associations, and service providers to run community or extra-curricular activities), they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the Trust Board and, where delegated, the Local Academy Committee or proprietor, under the direct supervision or management of their school staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body, this is not necessarily the case.

The Trust Board (as proprietor), supported by the Local Academy Committee, will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting

these as needed) and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The Trust Board and, where delegated, the Local Academy Committee will ensure that safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Lettings will not be made to persons under the age of 18, or to any organisation or group with an unlawful or extremist background.

The Designated Teacher

The Trust Board and, where delegated, the Local Academy Committee have appointed a Designated Teacher (DT) who works with the local authority to promote the educational achievement of registered pupils in our school who are looked after. Our Designated Teacher works across the school to promote educational outcomes and attendance for children in care using evidence-based interventions.

The Designated Teacher also promotes the educational achievement of previously looked-after children and works with the Virtual School and other relevant professionals to ensure appropriate support is in place.

The Designated Teacher has the details of the Local Authority Personal Advisor who has been appointed to guide and support the care leaver and liaises as necessary regarding any issues of concern affecting the care leaver.

We are aware of the additional duties of the virtual school headteacher extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. We understand the role that we play in improving outcomes for children with a social worker.

7. Working with parents/carers.

At Picknalls First School we are committed to working in partnership with parents/carers to safeguard and promote the welfare of their children, and to support them to understand our statutory responsibilities in this area.

When new pupils join our school, parents/carers will be informed that we have a safeguarding policy and that we are an Operation Encompass setting. A copy of this policy will be provided to parents on request and is available on the website. Parents/carers will be informed of our legal duty to assist our safeguarding colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the relevant local authority or other agencies.

We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so to safeguard a child from harm.

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

To keep children safe and provide appropriate care for them, we require parents to provide accurate and up-to-date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and at least 2 contacts.
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).
- Any legal or criminal changes which affect parental responsibility e.g., bail conditions, court orders, Special Guardianship orders, Child Arrangement Orders.

The school will retain this information on the pupil file. The school will normally share pupil information with those who have parental responsibility, or with another person where appropriate authority or consent has been provided. This does not prevent the school from sharing information without consent where it is lawful, necessary

and proportionate to safeguard or promote the welfare of a child, in accordance with this policy and current information-sharing guidance.

We recognise that we are likely to be in regular contact with parents and carers. We will use these communications to reinforce the importance of children being safe online, and parents/carers are likely to find it helpful to understand what systems schools use to filter and monitor online use. It will be especially important for parents/carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and to be clear about who from the school (if anyone) their child is going to be interacting with online.

8. Early Help incl community-based Early Help & Family Help

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.

Where statutory children's services are not required, the DSL/DDSL will support or coordinate appropriate multi-agency assessment and Family Help arrangements in line with Working Together 2026.

This support will be kept under review. If the child's situation does not appear to be improving, or is getting worse, the DSL/DDSL will consider a referral to local authority children's social care for assessment and statutory services. In line with Working Together 2026, appropriately qualified lead practitioners who are not social workers may lead work with families before statutory intervention and, where local arrangements permit, may continue to lead work up to and including section 17 support.

All staff are 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
- 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 into 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 experienced repeated removals from class, multiple suspensions, a part-time timetable, or is at risk of permanent exclusion or placement in Alternative Provision
- 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 or alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol or other drugs themselves
- has returned home to their family from care
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child

The DSL/DDSL will consider how the needs of different family members impact each other. This includes needs relating to education, mental and physical health, financial stability, housing, substance use and crime. We will also consider specific needs such as disabilities, those whose first language is not English, fathers or male carers, and parents who identify as LGBTQ.

The DSL/DDSL is aware of local Staffordshire Family Hubs and knows how and when to refer families for this level of support and intervention.

9. Referrals beyond early help/family help

Child in Need (Section 17)

If the DSL/DDSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will seek parent/carer consent for a referral to local /appropriate authority children's social care. If parents do not give

consent, but the child's needs are still not being met, the DSL may feel that a referral is still appropriate and will discuss these concerns with children's social care. Appropriate staff will attend Child in Need (CIN) meetings.

Child Protection (Section 47)

If the DSL/DDSL considers that a child is suffering, or is likely to suffer, significant harm, they will make a referral to children's social care without delay. Parents/carers will normally be informed unless doing so may increase the risk of harm. The school will attend and contribute to child protection conferences, core groups and review meetings as required.

We recognise that conferences can be upsetting for parents and we will work in an open, honest, and transparent way with parents and remain child focussed, and do this in partnership with our parents/carers where possible.

10. Escalation process

As part of our safeguarding practice, there will be occasions where we do not agree with decisions made by other professionals and we will work hard to resolve these differences at practitioner level. However, if we believe that concerns regarding a child are not being addressed and their outcomes are not improving, we will escalate our concerns in line with the Staffordshire Safeguarding Children Partnership Escalation Policy.

11. A safer school culture

Safer Recruitment and Selection

Staff who have lived or worked outside the UK will undergo the same checks as all other staff, even if they have never been to the UK. We will ensure that any other appropriate checks are carried out so that any relevant events that occurred outside the UK can be considered. These checks could include criminal records checks for overseas applicants and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach.

Separate children's barred list checks will only be undertaken where an individual will be engaging in regulated activity with children and:

- is permitted to start work before the Enhanced DBS Certificate with barred list information is available; or
- has worked in a post in a school, college or other relevant setting that brought them into regular contact with children or young people and that employment ended no more than three months before their appointment.

In either circumstance, all other appropriate pre-employment checks must have been completed, and the separate children's barred list check must be satisfactory before the individual begins work.

Where individuals subscribe to the DBS Update Service, the school may undertake status checks, in accordance with current guidance, to confirm that no new information has been added to their DBS certificate since its issue.

Where a self-employed individual is engaged to work in the school, the school will either obtain the required DBS check or verify that a DBS certificate obtained by the individual is at the appropriate level for the work being undertaken.

The school recognises that regulated activity includes work which involves teaching, training, instructing, caring for or supervising children, providing advice or guidance on their physical, emotional or educational wellbeing, driving a vehicle solely for children, or providing personal care or healthcare. The school will ensure that appropriate safeguarding and safer recruitment processes are applied to all staff, volunteers and others undertaking regulated activity with children.

From 1 September 2026, the Crime and Policing Act 2026 removes the supervision exemption from the definition of regulated activity with children. As a result, supervised unpaid teaching, training, instructing, caring for or supervising children is regulated activity where it is carried out frequently or meets the statutory period condition. This includes activity on more than three days in a 30-day period or overnight. Volunteers and other individuals undertaking such regulated activity must have an enhanced DBS check with children's barred list information before undertaking the activity, in accordance with current statutory guidance.

The school will undertake additional safeguarding checks where required by legislation or statutory guidance. This includes where an individual moves from a role that is not regulated activity into a role that constitutes regulated activity with children, where there has been a break in service of 12 weeks or more, or where concerns arise regarding an individual's suitability to work with children.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils. Relevant staff have undertaken appropriate training in Safer Recruitment.

Where applicable, the school will comply with the Childcare (Disqualification) Regulations 2018 and maintain the required records and declarations relating to disqualification under the Childcare Act 2006.

One of the trained safer recruitment staff will be involved in all staff and volunteer recruitment processes and sit on the recruitment panel. A member(s) of the Trust Board and, where delegated, the Local Academy Committee has received Safer Recruitment training.

Induction

All staff will be made aware, as part of induction, of the school's safeguarding systems and procedures, including the Safeguarding Policy, Behaviour Policy, Staff Code of Conduct, the safeguarding response to children absent from education, the role and identity of the DSL/DDSL(s), and the requirement to read Part One of KCSIE 2026 in full.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, remain visible to other members of staff. Consideration should be given to:

- Informing another member of staff of their whereabouts in school, who they are with and for how long.
- Doors having a clear glass panel in them and where possible be left open.
- No volunteers and parent helpers will be left unsupervised with children or out of sight of the teacher or member of staff responsible for them. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Use of reasonable force and other restrictive interventions

There are times when the use of restrictive interventions, including reasonable force and seclusion will be lawful and necessary; for example, to keep individuals and the wider school community safe.

'Reasonable' means using no more force than is necessary in the circumstances. Restrictive interventions, including reasonable force and seclusion, will only be used when lawful, necessary and proportionate, with regard to the child's age, needs, SEND, medical conditions, communication needs and any known trauma or safeguarding vulnerabilities. The school will follow current DfE statutory guidance on restrictive interventions and reasonable force.

Where a significant incident involving reasonable force or another restrictive intervention occurs, the school will make the required record, inform parents/carers as soon as practicable unless there is a safeguarding reason not to do so, and update relevant safeguarding or support plans. Incidents will be reviewed to identify patterns, triggers, learning and any changes needed to risk assessments, staff training or practice, with the aim of reducing the need for future restrictive intervention.

12. Keeping Children Safe in Education 2026 - Specific Safeguarding issues.

All staff receive appropriate training and updates on the safeguarding issues listed below. Further information and guidance is provided in Appendix 2.

- Abuse (incl. Physical/Emotional/Sexual/Neglect)
- Behaviours linked to safeguarding issues
- Bullying including cyberbullying
- Child-on-child abuse (including harassment and violence)
- Children and the court system (5-11yrs & 12-17yrs)
- Children missing from education

- Children who are absent from education
- Child missing from home or care
- Child Criminal Exploitation (CCE)
- Child sexual exploitation (CSE)
- County Lines
- Domestic abuse
- Drugs
- Fabricated or induced illness and Perplexing Presentations
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Homelessness

Temporary accommodation notification duty

From September 2026, local housing authorities have a duty under the Children's Wellbeing and Schools Act 2026 to notify relevant education settings when a child is placed in temporary accommodation where the required consent has been given. Any such notification will be considered promptly by the DSL so that welfare, attendance, educational and safeguarding needs can be assessed and appropriate support put in place. This does not replace a referral to children's social care where a child is at risk of harm.

- Mental health
- Online safety
- Private fostering
- Preventing radicalisation
- Prevent Duty and Channel
- Serious violence
- Trafficking

13. Children potentially at greater risk of harm

All children should be protected however, our staff and Trust Board and, where delegated, the Local Academy Committee recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups:

- Children who need a social worker (Child in Need & Child Protection)
- Children who are absent from education
- Children who are Elective Home Educated (EHE)
- Children requiring mental health support
- Looked after children (LAC), previously looked after children (PLAC) and care leavers.
- Children with special educational needs & disabilities or health needs.
- Children who are lesbian, gay, bisexual (LGB)
- Children who are questioning their gender
- Children who are young carers
- Children who are affected by parental conflict and/or domestic abuse
- Children who are refugees or asylum seekers
- Children vulnerable to/at risk of/involved in CSE/CCE

We will ensure that children who may be at greater risk of harm are listened to, supported and involved in decisions affecting them, with appropriate adjustments, trusted relationships and advocacy provided where needed.

Children with special educational needs, disabilities or health issues

We recognise that children with Special Educational Needs and Disabilities (SEND), and those with certain medical or physical health conditions, can face additional safeguarding challenges both online and offline. Staff are aware that additional barriers can exist when recognising abuse, neglect and exploitation in these children.

These barriers can include:

- assumptions that indicators of possible abuse, neglect or exploitation, such as behaviour, mood changes or injuries, relate to a child's disability, special educational need or health condition without further exploration;
- increased vulnerability to peer isolation, bullying, including prejudice-based bullying, and exploitation;
- being disproportionately impacted by harmful behaviours, including bullying, without outwardly displaying signs;
- communication barriers which may make it more difficult for a child to recognise, understand, disclose or report abuse;
- the need for intimate care and increased dependency on adults;
- reduced opportunities to develop protective relationships due to isolation from peers; and
- difficulties in understanding risks, including online risks, and distinguishing between fact and fiction, which may increase vulnerability to abuse, manipulation or exploitation.

Any safeguarding concerns involving a child with SEND will be considered in the context of their individual needs and circumstances. The Designated Safeguarding Lead (or Deputy DSL) will work closely with the Special Educational Needs Co-ordinator (SENCO) and other relevant professionals to ensure that children with SEND receive appropriate support, protection and opportunities to have their voice heard. The school will also consider whether additional pastoral support, communication support or reasonable adjustments are required to safeguard these children effectively.

Children who are questioning their gender

We are aware that there has been a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

We will take the time to understand the thoughts and feelings of children who are questioning their gender and will be appropriately professionally curious about the full range of their experiences. We will remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, e.g. relating to relationships with family, peers or their broader social environment, including discriminatory bullying.

We will ensure that any arrangements relating to toilets, changing facilities, physical education and other aspects of school life are managed in accordance with current statutory guidance, safeguarding requirements and equality duties. Where alternative arrangements are considered for a child who is questioning their gender, decisions will be made on an individual basis, taking account of the safety, privacy, dignity and wellbeing of all children. Appropriate records will be maintained, arrangements communicated to relevant staff and reviewed regularly.

We recognise that some sports and physical activities may be organised according to a child's biological sex where this is necessary to ensure safety or fairness. Any requests regarding participation in sport or physical education will be considered on an individual basis, taking account of safeguarding considerations, the child's best interests, the impact on other pupils, and the need to maintain safe and fair participation in physical education and sport.

We understand that it is not for us to initiate any action in this area; the guidance is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school is responding. (KCSIE will support and guide practice).

Elective Home Education

We are aware that many home educated children have a positive learning experience, however, this is not the case for all children. It can mean that they will not receive a suitable education and are less visible to the services and professionals that are there to keep them safe and supported in line with their needs.

When a parent/carer expresses that their intention is to remove a child from school with a view to educating at home, we will work with the local authority and other key professionals, where appropriate, to coordinate a meeting with parents/carers where possible. We will attempt to do this before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

In accordance with current pupil registration and elective home education guidance, we will inform the relevant local authority Elective Home Education service and share any safeguarding concerns and safeguarding records as appropriate.

Where a child has an Education, Health and Care Plan, the local authority will need to review the plan, working closely with parents/carers. The school will have regard to current DfE elective home education guidance and the SEND Code of Practice.

The school will also cooperate with the local authority in meeting any applicable duties under the Children's Wellbeing and Schools Act 2026 relating to children who are not in school, including the sharing of relevant information where required to support their education and safeguarding.

Young carers

We recognise that young carers may have additional needs and can be vulnerable where their caring responsibilities affect their wellbeing, attendance, attainment or ability to participate fully in school life. All staff will be alert to indicators that a child may be providing care or support to a family member and will share concerns with the DSL/DDSL. We will listen to the child's views, consider their needs within the wider family context and work sensitively with parents/carers and relevant agencies to identify appropriate support at the earliest opportunity. Where necessary, this may include community-based Early Help, Family Help or a referral to children's social care if there are safeguarding concerns or the child's needs are not being met.

Alternative Provision

We recognise that pupils placed in Alternative Provision may have complex needs and can be at increased risk of harm. The school remains responsible for safeguarding pupils it places in Alternative Provision and will ensure that the provision is suitable, appropriate safeguarding checks and information-sharing arrangements are in place, and named safeguarding contacts are identified.

The school will monitor the pupil's attendance, welfare and engagement, review the placement at least half termly, and respond promptly to any unexplained absence or safeguarding concern. Relevant safeguarding, SEND, risk and support information will be shared with the provider as appropriate. Where safeguarding concerns arise, the placement will be reviewed immediately and may be terminated if necessary.

Work Experience Placements

The school will ensure appropriate safeguarding arrangements are in place for pupils undertaking work experience. Before a placement begins, the school will seek assurance that the provider has suitable safeguarding procedures and that any required checks have been completed for adults undertaking regulated activity with children. Appropriate risk assessments will be completed where necessary.

14. Visitors

We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. Headteachers and principals should use their professional judgement about the need to escort or supervise such visitors.

For visitors who are there in a professional capacity, we will check ID and seek assurance that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks). We will not ask to see the certificate in these circumstances. Where a visitor will have no contact with children, it is unlikely that a DBS check will be required.

When external organisations or individuals visit the school, we will consider the purpose and educational value of the visit, the age-appropriateness of any activity, whether safeguarding checks are required, and the level of supervision needed. These decisions will be informed by professional judgement, relevant information about the visitor or organisation, and current KCSIE requirements.

15. Allegations made against/concerns raised in relation to teachers, including trainee teachers, supply teachers, other staff, volunteers, and contractors

We are committed to ensuring that all adults working in or on behalf of the school are safe to work with children and that any concerns or allegations are responded to promptly and appropriately.

The Trust Board and, where delegated, the Local Academy Committee ensures that there are procedures in place for dealing with the two sections covering two levels (see below) of concern and/or allegations against staff members, supply staff, trainee teachers, volunteers, and contractors:

- Allegations that may meet the harms threshold.
- Allegation/concerns that do not meet the harms threshold, referred to for this guidance as 'low level concerns'.

Allegations that may meet the harms threshold

We have an understanding of and give due regard to Part 4 of Keeping Children Safe in Education 2026, which sets out the requirements for managing concerns or allegations about adults who work with children, including allegations that may meet the harm threshold and concerns that do not meet the harm threshold (low-level concerns).

The procedures for managing allegations apply to all adults working in or on behalf of the school, including supply staff, contractors, volunteers and trainee teachers. Where it is alleged that someone working in our school (regardless of whether this is where the alleged abuse took place) has:

- behaved in a way that has harmed a child or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Then we will ensure that: -

- this will be referred to the headteacher or principal, who will consider whether an onward referral to the LADO is required,
- if there is a concern/allegation about the headteacher or principal, this will be referred to the CEO and Chair of the Trust Board (or another person formally delegated by the Trust Board), and
- in the event of a concern/allegation about the headteacher, where they are also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this will be reported directly to the LADO(s).

(If the Headteacher or Chair of Trust Board and, where delegated, the Local Academy Committee is not contactable on that day, the information will be passed to and dealt with by either the member of staff acting as Headteacher or the Vice Chair of the Trust Board / CEO (as applicable under the Trust procedure)).

Advice from the Local Authority Designated Officer (LADO) will be sought within one working day. No member of staff or the Trust Board and, where delegated, the Local Academy Committee will undertake further investigations before receiving advice from the LADO.

Where concerns or allegations relate to a supply teacher, contractor, trainee teacher or other individual not directly employed by the school, the school will work closely with the employment agency, provider and the LADO, where appropriate. Whilst the employer or agency will usually lead any employment or disciplinary procedures, the school remains responsible for gathering information and managing the safeguarding process.

Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police. If we are not the employer of an individual, we still have the responsibility to ensure allegations are dealt with appropriately. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

Our Trust Board (as proprietor), supported by the Local Academy Committee, will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Referrals to the LADO in Staffordshire are made via the Staffordshire LADO Referral Form, in accordance with Staffordshire Safeguarding Children Partnership procedures.

We recognize our legal duty to make a referral to the Disclosure and Barring Service (DBS) where an individual has been removed from regulated activity or would have been removed had they not left their employment or ceased volunteering, because they have harmed, or posed a risk of harm to, a child or vulnerable adult, engaged in relevant conduct, or satisfied the harm test. This duty applies to both paid staff and volunteers engaged in regulated activity. Referrals will be made as soon as possible and in accordance with statutory guidance.

Where a teacher's employer dismisses a teacher, or would have dismissed them had they not resigned, because of serious misconduct, the school will consider whether a referral should be made to the Teaching Regulation Agency (TRA) in accordance with statutory guidance. The TRA will consider whether the case should be referred to the Secretary of State for consideration of a prohibition order.

Learning lessons

It is important that lessons are learnt when managing all levels and types of allegations and the headteacher/case manager will review the circumstances of all substantiated cases with Staffordshire's LADO to determine whether improvements can be made to the school's procedures to help prevent similar events in the future. This will be done throughout the entirety of the process and at conclusion.

Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager will consider how future investigations of a similar nature could be carried out without suspending the individual.

Where an allegation is concluded to be either unfounded, false, malicious or unsubstantiated, the headteacher/case manager (and if they have been involved, the LADO) will consider the facts of each case and determine whether any lessons can be learned, and improvements made.

Allegation/concerns that do not meet the harms threshold – referred to for this guidance as 'low level concerns'

We promote an open and transparent culture in which concerns about adults are reported, recorded and addressed promptly, helping to identify inappropriate or concerning behaviour at the earliest opportunity.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school's low-level concerns policy/Staff Code of Conduct. (Part 4 KCSIE).

Low level concerns

Low level does not mean that the concern is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working in or on behalf of the school may have acted in a way that is:

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

All staff have a good understanding of what constitutes a low-level concern, and our Trust Board and, where delegated, the Local Academy Committee ensure that these low-level concerns are included as part of our staff code of conduct/safeguarding policies.

Sharing low-level concerns

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our school from potential false allegations or misunderstandings.

If we are in any doubt as to whether information shared about a member of our staff as a low-level concern in fact meets the harms threshold, we will consult with the LADO.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of the Trust Board / CEO (as applicable under the Trust procedure) knows to contact the LADO via the LADO referral form

The Trust, as employer/proprietor, has a legal duty to make a referral to the Disclosure and Barring Service (DBS) where the statutory referral criteria are met, including where a person has been removed from regulated activity, or would have been removed had they not left, because they have harmed or posed a risk of harm to a child, engaged in relevant conduct or satisfied the harm test. The referral will be made as soon as possible in accordance with statutory guidance and, where appropriate, advice from the LADO and/or HR. The DSL will provide relevant safeguarding information to support the Trust in meeting this duty.

16. Information sharing

2026 information-sharing duty.

The Children's Wellbeing and Schools Act 2026 introduced a statutory duty to share relevant information where sharing may help another relevant person to safeguard or promote the welfare of a child, subject to the statutory safeguard where disclosure would be more detrimental to the child than not disclosing it. i2e schools will apply this duty alongside KCSIE 2026, Working Together 2026 and current DfE information-sharing guidance. The Trust will update procedures if further final statutory guidance is issued during the policy year.

We are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

When we are making decisions on what information to share, we will consider: -

- the relevancy of the information, including to the current safeguarding risk
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

We will use our professional judgement to ensure that the information shared is focused and proportionate. This may include summarising or omitting information, which is not necessary for safeguarding purposes, but we will take care not to omit information where it may be relevant to understanding or managing safeguarding risk.

Where children leave our school, the DSL/DDSL will ensure that any safeguarding file is transferred (separately from the main school file) to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new setting to have support in place for when the child arrives. They will ensure secure transit, with confirmation of receipt being retained. The DSL will ensure key staff are aware of relevant information, as required.

The transferred safeguarding information will include a clear, structured summary of current safeguarding concerns, relevant context, risk or safety information, action taken and any ongoing support or multi-agency involvement. Current concerns will be clearly distinguished from historic information. The receiving setting should be enabled to understand what requires immediate attention and to seek clarification where necessary.

Where appropriate, the DSL will share relevant safeguarding information with the receiving setting in advance of transfer so that support, risk management and safeguarding arrangements can be put in place without delay. This may include information relating to social care involvement, Channel support, serious violence or harmful behaviours.

The 'Data Protection Laws' do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard, promote the welfare and protect the safety of children.

17. Managing complaints

- We encourage children, parents and carers to speak to us if they are unhappy with any aspect of school life. We seek to resolve concerns promptly and appropriately. The Trust Complaints Policy is available on the school website and on request and explains the stages of the complaints process and routes for escalation.

- Safeguarding concerns should be raised with us immediately. If a concern means a child is at immediate risk, we will contact children's social care based on where the child resides. All visitors are given safeguarding information which outlines how to share concerns and the code of conduct expected by visitors/contractors.

18. Site Security

- At Picknalls First School we understand the importance of site security, which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on our site must adhere to the rules which govern it. We will ensure that staff, children and parents/carers understand how to keep the site safe and what to do if they are worried.

18.1 Safeguarding requirements relating to school premises, changing facilities and sport

- i2e schools will comply with the School Premises (England) Regulations 2012, applicable independent school standards, the Equality Act 2010 and KCSIE 2026. Schools will provide and manage toilet, changing and shower facilities so that pupils' safety, privacy and dignity are protected. Decisions about individual arrangements will be recorded, communicated only to those who need to know, kept under review and made in accordance with current statutory guidance.
- In line with KCSIE 2026 and the School Premises (England) Regulations 2012, pupils aged 8 or over will be provided with separate toilet facilities for boys and girls except where a toilet is in a room intended for use by one pupil at a time and can be secured from the inside. Pupils will not be permitted to use toilet facilities designated for the opposite biological sex. Where changing or showering is required, pupils aged 11 or over will not be required or permitted to undress in the presence of pupils of the opposite biological sex. Any individual alternative arrangements will protect safeguarding, privacy and dignity and will be recorded and reviewed.
- For school trips, residential visits and other overnight activities, the school will ensure that sleeping arrangements are planned and risk assessed in line with KCSIE 2026. A child will not share overnight accommodation with a child of the opposite biological sex. Appropriate arrangements will be made to preserve privacy, dignity and safeguarding for all pupils.
- Where single-sex sport is required for safety or fairness, schools will follow the Equality Act 2010 exception for competitive sport and the safeguarding expectations in KCSIE 2026. Any request for an alternative arrangement will be considered individually, balancing the child's needs with the safety, privacy, dignity and rights of other pupils.

18.2 Homestay arrangements

- Where an i2e school arranges for a child to stay with a host family in the UK, including through a third-party company, the school will comply with KCSIE 2026 requirements for regulated activity and obtain the required enhanced DBS certificate with children's barred list information for responsible adults where the school is the regulated activity provider. The school will consider whether checks are appropriate for other household members aged 16 or over and will undertake appropriate risk assessment and safeguarding planning. Where a parent or pupil independently arranges a homestay, the arrangement is private and the school is not the regulated activity provider, although safeguarding concerns will still be acted upon.
- Picknalls First School does not offer to host families and this section is therefore N/A

19. Boarding schools/residential special schools

N/A

20). Early Years safeguarding arrangements

Where the school provides Early Years provision, it will comply with the safeguarding and welfare requirements of the Early Years Foundation Stage (EYFS) statutory framework and relevant requirements within Keeping Children Safe in Education 2026.

The school will ensure that:

- at least one person who holds a current paediatric first aid certificate is on the premises and available at all times when children are present and accompanies children on outings, in accordance with the EYFS requirements;

- clear procedures are in place for the appropriate use of mobile phones, cameras and other electronic devices, including smart watches, smart glasses and other devices with imaging, recording or sharing capabilities;
- appropriate safer recruitment procedures are followed, and the suitability of people working with children is established before appointment and kept under review where required;
- all practitioners receive appropriate safeguarding training, understand the school's safeguarding procedures and are supported to put their training into practice;
- staff understand the school's whistleblowing procedures and know how to raise concerns about safeguarding practice or the behaviour of another adult;
- children's absence is monitored appropriately, unexplained or prolonged absence is followed up, and safeguarding action is taken where an absence gives rise to concern;
- required staff-to-child ratios are maintained, and staffing arrangements support the effective supervision and safety of children;
- appropriate arrangements are in place for safer eating, including consideration of allergies, choking risks, appropriate supervision and children's individual dietary and medical needs;
- appropriate procedures are in place for toileting, nappy changing and intimate hygiene, which safeguard children's dignity, privacy and welfare;
- sleeping children, where applicable, are appropriately supervised, and safer sleeping arrangements are followed; and
- safeguarding arrangements within the Early Years provision are regularly reviewed to ensure that they remain effective and compliant with current statutory requirements.
- screen use and access to digital devices are managed in accordance with the current DfE Screen use guidance for early years settings. For children under 2, screen use will be avoided except in exceptional circumstances, such as a video call with a parent/carer. For children aged 2 to 5, screen use in the setting will be limited, purposeful and kept well within the DfE recommendation of no more than one hour a day, and less where possible, recognising that children may also use screens at home. Where screens are used, this will be for a clear learning or developmental purpose, for short periods and with appropriate adult co-engagement rather than independent or passive use. Screens will not routinely replace high-quality interaction, play, physical activity, outdoor learning, creative activity, rest or sleep, and will not normally be used to calm children, manage behaviour, occupy transitions or during mealtimes. Content will be age-appropriate and carefully selected. Appropriate assistive technology may be used to meet individual SEND needs. In line with current DfE advice, children in early years will not ordinarily use generative AI or AI-enabled toys. Pre-Reception assessment will be based on observation and professional judgement rather than screen-based assessment, and photographs or videos taken for assessment will be kept to the minimum necessary; and
- Picknalls First School ensure that its local Early Years procedures reflect these requirements and that staff understand how they apply within the school's provision. Safeguarding Induction Leaflet for New, Supply and Temporary Staff, Regular Visitors and Volunteers.

Everyone working in or visiting our school has a responsibility to safeguard and promote the welfare of children. Safeguarding is everyone's responsibility, and all concerns must be taken seriously and acted upon promptly.

If you are concerned about a child

If you have any concern about a child, however small it may appear, you must report it immediately to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL).

Do not assume that someone else will report the concern. Information about a child's appearance, hygiene, behaviour, attendance, emotional wellbeing, relationships, or something a child has said or disclosed may form part of a wider safeguarding picture.

If a child tells you something that concerns you:

- listen carefully and take what they say seriously;
- do not promise confidentiality;
- do not ask leading or investigative questions;
- reassure the child that they have done the right thing by telling you;
- report the concern to the DSL or DDSL as soon as possible; and
- make an accurate written or electronic record in accordance with the school's safeguarding procedures, using the child's own words wherever possible.

School safeguarding recording system/procedure:

If you cannot locate the DSL or a DDSL, contact the school office immediately and explain that you need to speak to them about an urgent and confidential safeguarding matter.

If you believe that a child is in immediate danger or at risk of significant harm, this must be acted upon without delay in accordance with the school's safeguarding procedures.

Concerns or allegations about an adult

Any concern or allegation about a member of staff, supply staff member, contractor, volunteer or other adult working with children must be reported immediately to the Headteacher. You must not investigate the matter yourself.

If the concern or allegation relates to the Headteacher, it must be reported immediately to the person identified by the Trust as the appropriate case manager.

Where a concern or allegation may meet the harm threshold, it will be managed in accordance with Part Four of Keeping Children Safe in Education 2026, including consultation with or referral to the Staffordshire Local Authority Designated Officer (LADO) where appropriate.

Concerns that do not meet the harm threshold must still be reported. These will be managed in accordance with the Trust's procedures for low-level concerns.

Case manager for concerns or allegations about the Headteacher: CEO Kerry Rochester (k.rochester@i2e.org.uk)

Staffordshire LADO contact/referral arrangements:

Key safeguarding contacts

DSL – Anne Tapp (Headteacher) 01889 228700

DDSL – Angela Jones (Assistant Headteacher) 01889 228700

DDSL – Stephanie Fenton (SENCO) 01889 228700

DDSL - Reneta Milward (admin Officer) 01889 228700

Paul Johnson (Chair of Governors) 01889 228700

Case manager for concerns about the Headteacher – Kerry Rochester (CEO) k.rochester@i2e.org.uk, 07729 688812

Before you begin

Before undertaking your role in school, you must ensure that you:

- know who the DSL and DDSL(s) are and how to contact them;
- know how to report and record a safeguarding concern;
- know what to do if a child makes a disclosure;
- know how to report a concern or allegation about an adult;
- understand the school's expectations regarding professional conduct, mobile phones and other electronic devices, and online safety; and
- have received or read the safeguarding information appropriate to your role.

If you are unsure about any safeguarding matter, speak to the DSL. Never assume that someone else will act.

Appendix 1

Definitions and Indicators of Abuse and Neglect

Abuse

Abuse is 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, 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, sometimes referred to as child-to-parent or caregiver abuse.

Physical Abuse

Physical abuse may involve:

- hitting;
- shaking;
- throwing;
- poisoning;
- burning or scalding;
- drowning;
- suffocating; or
- otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve:

- conveying to a child that they are worthless, unloved or inadequate, or valued only insofar as they meet the needs of another person;
- persistent criticism, belittling, name-calling or other verbal abuse;
- not giving a child opportunities to express their views;
- deliberately silencing a child or making fun of what they say or how they communicate;
- imposing age- or developmentally inappropriate expectations;
- interactions that are beyond a child's developmental capability;

- overprotection or limiting opportunities for exploration, learning or normal social interaction;
- seeing or hearing the ill-treatment of another;
- serious bullying, including cyberbullying;
- causing a child frequently to feel frightened or in danger; or
- exploitation or corruption of a child.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may also occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening and whether or not violence is involved.

The activities may involve physical contact, including:

- assault by penetration, such as rape or penetration with an object; or
- non-penetrative acts such as masturbation, kissing, rubbing or touching outside clothing.

Sexual abuse may also include non-contact activities, such as:

- involving children in looking at sexual images;
- involving children in the production of sexual images;
- watching sexual activities;
- encouraging children to behave in sexually inappropriate ways; or
- grooming a child in preparation for abuse, including online.

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 staff must follow the school's procedures for responding to child-on-child abuse.

The school will refer to relevant current guidance and resources, including those produced by the Centre of Expertise on Child Sexual Abuse (CSA Centre), when supporting staff to recognise and respond to concerns about child sexual abuse.

Neglect

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

Neglect may occur during pregnancy, for example as a result of maternal substance misuse.

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 appropriate caregivers;
- ensure access to appropriate medical care or treatment; or

- respond appropriately to a child's basic emotional needs.

Staff should understand that neglect may become apparent through a pattern of smaller concerns or incidents over time rather than through a single event.

The school will refer to relevant Staffordshire Safeguarding Children Partnership guidance and the Right Help, Right Time framework when identifying and responding to concerns about neglect.

Parental response

Research and professional experience indicate that the following responses from parents or carers may suggest a cause for concern:

- delay in seeking treatment that is clearly required;
- unawareness or denial of an injury, pain or loss of function;
- incompatible or changing explanations for an injury or concern;
- explanations that are inconsistent with the child's age or developmental stage;
- reluctance to provide information or failure to mention other known relevant injuries or concerns;
- frequent presentation of minor injuries;
- a persistently negative attitude towards the child;
- unrealistic expectations of, or persistent complaints about, the child;
- alcohol or substance misuse;
- a request for the child to be removed from the home;
- violence between adults in the household; or
- evidence of coercion and control.

These indicators do not, on their own, confirm abuse or neglect. Staff must consider the wider context, exercise professional curiosity and report concerns to the DSL or DDSL.

Children with disabilities

Children with disabilities may face additional safeguarding risks, and indicators of abuse or neglect may present differently. Practitioners should be alert to concerns including:

- a bruise or injury in a location that may be less expected in a non-mobile child;
- insufficient support with feeding, leading to malnutrition or poor weight gain;
- inadequate toileting or intimate-care arrangements;
- lack of appropriate stimulation;
- unjustified or excessive use of restraint;
- rough handling;
- inappropriate behaviour-management practices, including deprivation of medication, food or clothing;
- disabling or restricting access to essential equipment, such as wheelchair batteries;

- unwillingness to learn or use a child's preferred means of communication;
- ill-fitting or inappropriate equipment, such as splints or other mobility aids;
- misappropriation of a child's money or possessions; or
- inappropriate or unnecessary invasive procedures.

Staff must avoid assuming that signs of possible abuse, neglect or exploitation are simply a consequence of a child's disability, health condition or special educational need. Any concern must be considered carefully and shared with the DSL or DDSL.

Appendix 2

Specific safeguarding issues

Behaviours linked to safeguarding issues

Safeguarding concerns often overlap. Staff should consider the whole child and the wider context rather than viewing behaviours in isolation. Indicators such as substance misuse, persistent or unexplained absence from education, serious violence, criminal or sexual exploitation, county lines involvement, radicalisation, or the making or sharing of nude or semi-nude images may indicate that a child needs help or protection. Staff must act on concerns without developing high thresholds for intervention and report them to the DSL/DDSL in accordance with this policy.

Bullying, including cyberbullying

Bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group physically or emotionally. It can occur face to face or online and may be prejudice-based or discriminatory.

- physical bullying, such as hitting, kicking, damaging or taking possessions;
- verbal bullying, including threats, name-calling and racist, faith-based, homophobic, biphobic, sexist or disablist language;
- emotional or relational bullying, including exclusion, humiliation or manipulation; and
- cyberbullying, including abusive messages, impersonation, image-based abuse and the making or sharing of nudes or semi-nudes.

The school will respond in accordance with its Behaviour and Anti-Bullying policies and will treat bullying as a safeguarding concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Child-on-child abuse, including sexual violence, sexual harassment and harmful sexual behaviour

All staff understand that children can abuse other children and that this can occur inside or outside school and online. Child-on-child abuse is never acceptable and will not be dismissed as banter, part of growing up, or “just having a laugh”. The school maintains a zero-tolerance approach to sexual violence, sexual harassment and other abusive behaviour while ensuring that responses are proportionate, child-centred and supportive of all children involved.

Staff will challenge inappropriate behaviour early, respond to reports promptly, reassure children that they are being taken seriously and will be supported and kept safe, and ensure that no child is made to feel ashamed or responsible for reporting abuse. Abuse that occurs online or outside school will be treated as seriously as abuse occurring on the school site.

Staff recognise that some children may be more vulnerable to child-on-child abuse, including girls, children with SEND, children who are lesbian, gay or bisexual, and children who are questioning their gender. This does not mean that abuse involving other children is less serious.

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

- bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- abuse in intimate personal relationships between children;

- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; physical assault, harm or threats of harm involving a weapon or other object;
- sexual violence, including rape, assault by penetration and sexual assault;
- sexual harassment, including sexual comments, jokes, taunting, sexualised name-calling, deliberately brushing against someone, interfering with clothing, or displaying sexual images;
- misogynistic or other discriminatory behaviour, language or attitudes;
- causing someone to engage in sexual activity without consent;
- making, creating, possessing, sharing or threatening to share nude or semi-nude images, including AI-generated or manipulated sexual imagery;
- upskirting; and
- initiation or hazing-type violence or rituals, including online elements.

Harmful sexual behaviour (HSB) exists on a continuum from developmentally expected behaviour through to inappropriate, problematic, abusive or violent behaviour. When assessing HSB, staff will consider age, developmental stage, SEND, power imbalances, coercion, consent and the wider context. A child under 13 can never legally consent to sexual activity. The school will use appropriate risk assessment and safety planning and will consider support for the child who has experienced the behaviour, the child who displayed it, and any other affected children.

Where nude or semi-nude images are involved, the school will follow current UKCIS/DfE guidance. The response will distinguish between consensual and non-consensual image sharing and will always consider the age, circumstances, coercion, exploitation and safeguarding needs of the children involved. Staff will not view or forward imagery unless specifically required by safeguarding guidance or law-enforcement advice. The school will review patterns and trends in safeguarding, behaviour and child-on-child abuse incidents to inform staff training, curriculum content, supervision, risk assessment and preventative work.

Children who are absent from education and children missing education (CME)

Repeated or prolonged absence from education can be a warning sign of abuse, neglect, exploitation, mental health difficulties, substance misuse, radicalisation, forced marriage, female genital mutilation or other safeguarding concerns. Staff will follow the school Attendance Policy and current DfE guidance on attendance and children missing education.

The school will distinguish between a child who is absent from education and a child who is reported missing. Where a child is missing and cannot be located, the school will act promptly, including contacting parents/carers and the police where appropriate, and will share relevant information with other professionals. The school will maintain at least two emergency contact numbers for each pupil where reasonably possible.

Children missing from home or care

Children who go missing from home or care may be at increased risk of criminal or sexual exploitation, trafficking, serious violence, substance misuse, self-harm or other abuse. The DSL/DDSL will share information with relevant agencies and support return-home interviews and safety planning where appropriate.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

CCE and CSE are forms of abuse in which an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity. This may be in exchange for something the child needs or wants, for financial advantage or status, or through violence or threats of violence. A child may have been exploited even where the activity appears consensual or where the child has committed an offence.

Children can be exploited by individuals, gangs or organised networks, online or offline, and may be trafficked for the purpose of exploitation. Criminal exploitation may constitute modern slavery. Where there are indicators of exploitation, the school will make appropriate safeguarding referrals and consider whether the National Referral Mechanism (NRM) should be engaged through an authorised First Responder organisation. The Crime and Policing Act 2026 contains specific measures addressing child criminal exploitation and cuckooing. The school will keep its procedures under review as relevant provisions are commenced and will treat suspected

exploitation, coercion, control of premises for criminal purposes or related serious violence as safeguarding concerns requiring prompt consideration of children's social care and police involvement.

Indicators may include:

- unexplained gifts, money or new possessions;
- association with people involved in exploitation or significantly older peers;
- changes in emotional wellbeing, behaviour or relationships;
- substance misuse;
- going missing or returning home late;
- persistent or unexplained absence from education;
- unexplained travel, hotel stays or being found away from home;
- possession of multiple phones or unexplained phone activity; and
- injuries, threats, debt, fear or evidence of coercion.

CSE is a form of child sexual abuse and can occur over time or as a one-off incident, including through the sharing of sexual images without the child's knowledge. It can affect any child, including 16- and 17-year-olds who may legally consent to some sexual activity but cannot consent to exploitation.

County lines

County lines is a form of criminal exploitation in which gangs or organised criminal networks use dedicated phone lines or other communication methods to facilitate the supply of illegal drugs. Children and vulnerable adults may be exploited to move, store or sell drugs or money. No particular distance of travel is required.

Specific indicators can include:

- going missing and being found away from home;
- being involved in serious violence or carrying weapons;
- receiving drug-related requests via a phone or social-media account;
- moving drugs or collecting money;
- internal concealment of drugs ("plugging");
- being found in a "trap house", "cuckooed" property, hotel or other unfamiliar accommodation associated with drug activity;
- owing a debt to exploiters; or
- having bank accounts used to facilitate criminal activity.

Where trafficking or modern slavery is suspected, the DSL/DDSL will ensure appropriate safeguarding action and consider referral to the National Referral Mechanism (NRM) through an authorised First Responder organisation. Schools themselves are not automatically designated First Responders.

Children with medical conditions and safeguarding

A medical incident, including an allergy-related incident, will not automatically require a safeguarding referral. However, safeguarding action may be required where a child's medical needs are not being met, relevant information is withheld, essential medication is repeatedly unavailable, or the child's condition increases their vulnerability to neglect, abuse or exploitation. The school will follow its Supporting Pupils with Medical Conditions and allergy-management arrangements alongside this policy.

Domestic abuse, parental conflict and Operation Encompass

Domestic abuse can be a single incident or a pattern of abusive behaviour and can include psychological, physical, sexual, financial or emotional abuse, as well as controlling or coercive behaviour. Children are victims of domestic abuse in their own right when they see, hear or experience its effects. Domestic abuse may also occur within young people's own intimate relationships or through child-to-parent or caregiver abuse.

Parental conflict is not automatically a safeguarding concern, but frequent, intense or unresolved conflict can affect a child's wellbeing, behaviour, attendance and educational outcomes. Where conflict is harmful or indicates abuse, staff will consider Early Help, Family Help or safeguarding action as appropriate.

Operation Encompass is a statutory information-sharing scheme under which police forces notify relevant education settings after attending domestic abuse incidents where a child is a victim. This includes children

connected to the household, whether or not they were physically present. Notifications are received securely by the DSL/DDSL and used to inform timely support. An Operation Encompass notification does not replace a referral to children's social care where safeguarding thresholds are met.

The Staffordshire commissioned domestic abuse service is New Era. Current support information is available through Staffordshire County Council and New Era.

Drugs and substance misuse

Substance misuse by a child, parent or carer can be associated with neglect, exploitation, unsafe caregiving, poor attendance, crime and other safeguarding risks. Staff will consider the child's welfare and make referrals to appropriate services or children's social care where required.

Fabricated or Induced Illness (FII) and Perplexing Presentations (PP)

Fabricated or Induced Illness (FII) describes situations in which a child is harmed through a carer's actions in fabricating, exaggerating or inducing symptoms or illness. Perplexing Presentations (PP) may involve medically unexplained symptoms or concerning behaviour around a child's health where the cause is not clear. Concerns should be shared with the DSL/DDSL and relevant health professionals and managed in accordance with current Staffordshire and national guidance.

Homelessness and housing insecurity

Homelessness or the risk of homelessness can present significant welfare and safeguarding risks. The DSL/DDSL will be alert to indicators such as rent arrears, household debt, domestic abuse, anti-social behaviour or threatened eviction and will use local housing and family-support routes. A housing referral does not replace a referral to children's social care where a child has suffered or is at risk of harm. Particular consideration will be given to 16- and 17-year-olds living independently.

Honour-based abuse, female genital mutilation and forced marriage

Honour-based abuse (HBA) includes incidents or crimes committed to protect or defend the perceived honour of a family or community. It can include female genital mutilation (FGM), forced marriage and other harmful practices. All forms of HBA are abuse and will be responded to as safeguarding concerns. Staff will not share information with family or community members where doing so could increase risk.

Female Genital Mutilation (FGM)

FGM comprises procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It is illegal in the UK and is a form of child abuse. Teachers have a statutory duty under section 5B of the Female Genital Mutilation Act 2003 to report personally to the police where, in the course of their professional duties, they discover that FGM appears to have been carried out on a girl under 18. This duty applies where the teacher is informed by the girl or observes physical signs; children must not be examined to determine whether FGM has occurred. Suspected or at-risk cases that do not meet the mandatory reporting threshold must still be managed through normal safeguarding procedures and discussed with the DSL/DDSL.

Forced marriage

Forced marriage is a marriage entered into without the full and free consent of one or both parties and where violence, threats or another form of coercion is used, or where a person lacks capacity to consent. It is also an offence to cause a child to marry before their eighteenth birthday, even where coercion is not used. This includes non-binding and unofficial ceremonies. Staff must treat any concern as urgent and must not contact family or community members if doing so could increase risk. Advice is available from the Forced Marriage Unit on 020 7008 0151 and through current GOV.UK guidance.

Mental health and wellbeing

All staff understand that mental health concerns can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are well placed to notice changes in behaviour, sleep, social interaction, self-care, self-harm, eating patterns or expressions of hopelessness or suicidal thoughts.

Only appropriately trained professionals should diagnose mental-health conditions. Where a mental-health concern is also a safeguarding concern, staff will follow this policy and speak to the DSL/DDSL. If there is an immediate risk to life or safety, emergency services will be contacted. Where urgent mental-health support is required but the situation is not an emergency, the school will use NHS 111 or other appropriate local routes.

Online safety, mobile phones and personal devices

Technology is a significant component of many safeguarding issues, including exploitation, radicalisation, sextortion, sexual abuse, bullying and harmful or inappropriate content. Online safety is therefore a running and interrelated theme across safeguarding, curriculum, staff training, parental engagement and the work of the DSL.

The Crime and Policing Act 2026 also strengthens the legal framework relating to technology-facilitated sexual harm, including intimate-image abuse and so-called nudification tools. The school will treat the creation, manipulation, possession, sharing or threatened sharing of sexual imagery involving children as a safeguarding matter and will respond in line with KCSIE, UKCIS guidance and the law.

Online risks are considered across the four areas of risk ("4Cs"):

- Content - exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme violence, misinformation, disinformation and conspiracy theories;
- Contact - harmful interaction with others online, including grooming, exploitation, peer pressure, commercial targeting and adults posing as children or young adults;
- Conduct - behaviour that increases the likelihood of harm, including bullying, sexual harassment, making or sharing explicit images and AI-generated or manipulated sexual content; and
- Commerce - risks including gambling, inappropriate advertising, phishing, scams and other financial exploitation.

The school operates in accordance with current national guidance on mobile phones in schools and its own Behaviour and Mobile and Smart Technology policies. Personal internet-enabled devices, including smart watches and smart glasses, are managed so that safeguarding, privacy, wellbeing and educational risks are reduced. Any exception for medical, safeguarding or educational reasons will be specifically authorised and recorded.

The Trust and its schools will meet the DfE filtering and monitoring standards by:

- assigning clear roles and responsibilities for filtering and monitoring;
- reviewing filtering and monitoring provision at least annually and following significant change;
- blocking harmful and inappropriate content without unreasonably restricting teaching, learning or access to safeguarding information; and
- maintaining effective monitoring strategies that reflect the age, needs and risks of pupils and the technologies in use, including generative AI products.

The annual review will be led by the responsible senior leader with support from the DSL and Trust IT/service providers. Records of checks, concerns and actions will be retained and reported through governance arrangements. Where pupils learn remotely, the school will apply the same safeguarding principles and use current DfE guidance on remote education and online safety.

Private fostering

A private fostering arrangement is one made privately, without local-authority involvement, for a child under 16 (or under 18 if disabled) to be cared for by someone who is not a parent or close relative for 28 days or more. Staff who become aware of a private fostering arrangement must inform the DSL/DDSL. The school will notify Staffordshire Families Integrated Front Door so that the local authority can assess the arrangement and the child's welfare.

Preventing radicalisation and the Prevent Duty

Children may be susceptible to radicalisation into terrorism. Protecting children from this risk forms part of the school's wider safeguarding responsibilities. Radicalisation is the process by which a person comes to support terrorism or extremist ideologies associated with terrorist violence. Terrorism has the meaning given in the Terrorism Act 2000.

The school has due regard to the need to prevent people from being drawn into terrorism. Leaders and the DSL/DDSL will maintain an appropriate Prevent risk assessment, ensure relevant staff training and awareness, and use the national Prevent referral process and local safeguarding arrangements where concerns arise. Where appropriate, a referral may be considered for Channel support. The school will monitor and manage online risks linked to radicalisation through its filtering and monitoring arrangements, curriculum, staff awareness and safeguarding procedures.

Serious violence

Serious violence may involve assault, weapons, peer conflict, gang association or criminal exploitation. Staff will be alert to indicators such as increased absence, changes in friendships or association with older individuals or groups, decline in performance, self-harm, changes in wellbeing, unexplained injuries, carrying weapons or threats of violence.

Concerns must be reported promptly to the DSL/DDSL. The DSL will assess risk to the child and others, consider safety and support planning, share information with relevant agencies where appropriate and ensure early, evidence-informed support is considered. This may include trusted-adult support, social and emotional interventions, mentoring, therapeutic support and action to de-escalate peer conflict. Relevant information may be shared with the police in accordance with safeguarding and information-sharing duties.

Children with family members in prison

Children with a parent or family member in prison may experience stigma, emotional distress, financial hardship, changes in caregiving arrangements and difficulties with attendance or learning. Staff will consider the child's individual needs and provide or signpost support as appropriate.

Children and the court system

Children who are involved in criminal or family court proceedings may require additional support. The school will work with relevant agencies and provide age-appropriate support to safeguard the child and minimise disruption to education.

Child abduction and community safety incidents

Through the curriculum and wider safeguarding arrangements, pupils are taught about personal safety and how to respond to situations that may place them at risk. Concerns relating to child abduction, attempted abduction or community safety incidents will be managed through the school's safeguarding procedures and shared with the police or other agencies where appropriate.

Appendix 3

Indicators of vulnerability to radicalisation

There is no single profile of a child who may be susceptible to radicalisation, and the presence of one or more indicators does not mean that a child is being radicalised. Staff should consider changes in behaviour in context, exercise professional curiosity and share concerns with the DSL/DDSL.

Current government definition of extremism

The Government's 2024 definition states that extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

- negate or destroy the fundamental rights and freedoms of others;
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve either of those outcomes.

The 2024 definition supersedes the earlier definitions published in the 2011 Prevent Strategy and 2015 Counter-Extremism Strategy. Lawful debate, protest, expression of belief and political activity are not, by themselves, extremism.

Possible indicators of susceptibility

- a significant change in behaviour, friendship groups, online activity or engagement with education;
- increasing isolation or a strong sense of grievance, injustice or personal crisis;
- exposure to extremist propaganda, recruiters or online communities;
- expressing support for terrorist violence or justifying violence to achieve political, religious or ideological aims;
- possessing or repeatedly accessing extremist material;
- attempts to recruit or influence others towards extremist ideology;
- family or peer links to terrorism-related offending or previous Channel intervention;
- fascination with extreme violence or mass-casualty attacks; or
- other contextual factors which, taken together, cause concern about a child's safety or susceptibility to radicalisation.

Staff must avoid stereotyping children on the basis of faith, ethnicity, SEND, migration history, political views or other protected characteristics. Any referral must be based on the individual child's circumstances and a proportionate assessment of risk.

Appendix 4

Role of the Staffordshire Local Authority Designated Officer (LADO)

The Staffordshire Local Authority Designated Officer (LADO) provides advice, guidance and oversight where a concern or allegation about an adult who works or volunteers with children may meet the harm threshold in Part Four of KCSIE 2026.

The detailed Trust procedure for managing allegations and concerns about adults is set out in Section 15 of this policy. Where the harm threshold may be met, the case manager will seek LADO advice within one working day and use the Staffordshire LADO Referral Form and current Staffordshire Safeguarding Children Partnership procedures. Where there is immediate risk to a child or urgent suspected criminal offending, the police and/or children's social care will also be contacted without delay.

Appendix 5

Useful safeguarding contacts

Schools should use the most current contact information published by Staffordshire County Council, Staffordshire Safeguarding Children Partnership and relevant national services.

Staffordshire contacts

- Emergency - if a child is at immediate risk of harm: Police 999.
- Staffordshire Families Integrated Front Door (SFIFD): 0300 111 8033 during office hours.
- Emergency Duty Service (out of hours): 0345 604 2886.
- Staffordshire Education Safeguarding Advice Service (ESAS): 01785 895836.
- Staffordshire LADO: referrals/consultations via the Staffordshire LADO Referral Form and Staffordshire Safeguarding Children Partnership procedures.
- New Era domestic abuse support (victims): 0300 303 3778. In an emergency call 999.
- Staffordshire Family Hubs / Early Help and Family Help: access through Staffordshire County Council and, where appropriate, the Staffordshire Families Integrated Front Door.

National contacts and support

- NSPCC Helpline: 0808 800 5000.
- NSPCC Whistleblowing Advice Line for safeguarding concerns in organisations: 0800 028 0285.
- Childline: 0800 1111.
- Professionals Online Safety Helpline (POSH): 0344 381 4772.
- CEOP Safety Centre: report online sexual abuse or exploitation through the official CEOP reporting service.
- Internet Watch Foundation (IWF): report child sexual abuse imagery and other illegal online sexual content through the official IWF reporting service.
- Forced Marriage Unit: 020 7008 0151.
- NHS 111: urgent health or mental-health advice where the situation is not an emergency.
- Emergency services: 999 where there is immediate danger or risk to life.

For Prevent concerns, the DSL/DDSL will use the current national Prevent referral process and Staffordshire safeguarding/police arrangements. For suspected modern slavery or trafficking, the DSL/DDSL will contact children's social care and consider referral to the National Referral Mechanism through an authorised First Responder organisation.

Appendix 6: School-specific safeguarding arrangements

Local arrangement	School response
Safeguarding recording / case-management system	MyConcern
DSL cover arrangements, including absence/out-of-hours arrangements where applicable	DDSL's would cover the DSL should they not be on site DDSL's to contact the DSL/CEO should they need support/advice out of hours
Filtering and monitoring products / provider and escalation route	SECURLY – issues escalated to the i2e IT team
Annual filtering and monitoring review date and responsible SLT lead	i2e led, checked in school/escalated by Reneta Milward (Admin Officer)
How safeguarding updates are communicated to staff during the year	Emails, National College, Staff Meetings, Staff Briefings, Staff Communication Board, Policy Rack
Operation Encompass key adult(s) and local process	Anne Tapp (HT), Angela Jones (AHT), Stephanie Fenton (SENCO)
Local Early Help / Family Help links and community partnerships	Contact through SCC front door
How safeguarding information is communicated to parents/carers	Emails, Newsletters, Welcome board in reception, Website
Mental health / pastoral support offer and referral routes	Staff support overseen by Julia Simon (Admin assistant) as our mental health first aider. All children are nurtured and supported and offered Hope/Elsa if needed.
Site security arrangements and local risks	Mr Bruce (site technician) oversees all site aspects overseen by the Headteacher (Premises Manager)
Visitor / contractor sign-in and identification arrangements	Julia Simon/Reneta Milward oversee sign in/reception aspects
Local arrangements for mobile phones and smart/wearable technology	Staff to use mobile phones only when not overseen by children, unless previously approved by senior leaders
Local arrangements for pupils in alternative provision (if applicable)	Should this be required all aspects to be overseen by the Headteacher/SENCO
Local arrangements for EYFS safeguarding (if applicable)	As above for DSL/DDSL
Local homestay arrangements (if applicable)	N/A
Named person checking the Single Central Record and frequency of checks	Headteacher and safeguarding Governor termly
Safeguarding link governor monitoring arrangements / reporting cycle	Headteacher and safeguarding link Governor meet at least termly and report back to the LAC
Any additional school-specific safeguarding risks or contextual safeguarding priorities	

Current statutory and national guidance

- Keeping Children Safe in Education 2026 (in force from 1 September 2026)
- Working Together to Safeguard Children 2026
- Children's Wellbeing and Schools Act 2026

- Crime and Policing Act 2026, including regulated activity reforms effective from 1 September 2026 and the statutory framework for mandatory reporting of child sexual abuse
- Early Years Foundation Stage statutory framework for group and school-based providers (from 1 September 2026), where applicable
 - DfE Screen use guidance for early years settings (from 1 September 2026), where applicable
- Mobile Phones in Schools statutory guidance (schools should follow from 1 September 2026)
- Restrictive interventions, including the use of reasonable force, in schools (effective from 1 April 2026)
- DfE filtering and monitoring core standard, updated August 2026, including generative AI product-safety expectations
- Cyber security standards for schools and colleges
- Prevent duty guidance
- Staffordshire Safeguarding Children Partnership procedures and Right Help, Right Time framework