Staffordshire University Academies Trust

SUAT Safeguarding Policy

Last reviewed	August 2026
Reviewed by	Estates and Compliance Manager
Approved by	Trust Board
Date of approval	September 2026
Policy owner	DLSI
Location	Website

This Safeguarding Policy outlines the strategic and operational safeguarding arrangements across all schools within Staffordshire University Academies Trust (SUAT). It has been developed in accordance with the Department for Education statutory guidance Keeping Children Safe in Education 2026 (KCSIE 2026), effective from 1 September 2026, and Working Together to Safeguard Children 2026, together with the Staffordshire Safeguarding Children Partnership (SSCP) Right Help, Right Time Framework, escalation process and associated safeguarding procedures.

The policy also has regard, where relevant, to the Children Acts 1989 and 2004; Education Act 2002; Education and Inspections Act 2006; Equality Act 2010; Human Rights Act 1998; Safeguarding Vulnerable Groups Act 2006; Counter-Terrorism and Security Act 2015; Domestic Abuse Act 2021; Data Protection Act 2018; UK General Data Protection Regulation; Data (Use and Access) Act 2025; Children's Wellbeing and Schools Act 2026; Crime and Policing Act 2026; and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.

The Trust will implement safeguarding arrangements in accordance with relevant duties introduced through the Children's Wellbeing and Schools Act 2026.

This includes promoting early intervention through Family Help, supporting effective multi-agency working, recognising attendance as a safeguarding issue, responding appropriately to notifications relating to children living in temporary accommodation and ensuring that safeguarding arrangements remain focused on improving outcomes and wellbeing for children.

The Trust will continue to review and strengthen safeguarding arrangements in response to legislative developments, statutory guidance, local safeguarding partnership requirements and emerging safeguarding risks.

Safeguarding and promoting the welfare of children is everyone's responsibility. All staff have a responsibility to provide a safe environment in which children can learn and must maintain an attitude of "it could happen here" where safeguarding is concerned.

The Trust is committed to maintaining a strong safeguarding culture across all schools, where safeguarding is everyone's responsibility and the welfare of children is paramount.

Staff are expected to remain professionally curious, particularly where children may be vulnerable, where information is incomplete, inconsistent or unclear, or where concerns may not initially meet statutory thresholds.

Staff will be encouraged to ask questions, seek clarification, share concerns and challenge decisions where necessary to ensure that children receive the right help at the right time.

The Trust promotes an open and transparent safeguarding culture where concerns are welcomed, acted upon appropriately and used to improve safeguarding practice and outcomes for children.

All staff should feel confident that safeguarding concerns will be taken seriously and responded to promptly, proportionately and in the best interests of the child.

The Trust takes a child-centred approach and will always consider what is in the best interests of the child. Safeguarding practice will be inclusive, anti-discriminatory and responsive to the individual circumstances, experiences and needs of children and their families.

Equality, Diversity and Inclusion

The Trust recognises that some children may experience additional barriers, vulnerabilities or inequalities that can increase safeguarding risks or make it more difficult for concerns to be identified and reported.

Safeguarding arrangements will be inclusive, equitable and responsive to the diverse needs of all children, regardless of age, disability, sex, race, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity, marriage or civil partnership status, socio-economic background or family circumstance.

Staff will be alert to the impact that discrimination, prejudice, exclusion, bullying, isolation and unequal access to support may have on a child's wellbeing, safety and ability to thrive.

The Trust is committed to creating environments where children feel safe, valued, respected, listened to and included, and where diversity is celebrated and protected.

Safeguarding decisions will be informed by the individual circumstances, lived experiences and protected characteristics of children and their families, ensuring that support is tailored, proportionate and child-centred.

The Voice of the Child

The Trust recognises that safeguarding is most effective when children are listened to, understood and involved in decisions that affect them. Staff will seek, hear, record and take account of the wishes, views, feelings and lived experiences of children when assessing risk, planning support and making safeguarding decisions.

Where appropriate and proportionate, children will be supported to participate in decision-making about their safety, wellbeing and support needs. The best interests of the child will remain central to all safeguarding practice.

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.

1. Scope

This policy applies to all staff, volunteers, trustees, governors, and contractors working within any of the 21 schools in SUAT. Each school will have a local safeguarding appendix that includes school-specific contacts and procedures.

2. Roles and Responsibilities

The SUAT Board of Trustees has overarching responsibility for ensuring safeguarding compliance. The following roles support safeguarding governance and operations:

- Trust DSL – Holds overall responsibility for strategic safeguarding across the Trust.
  Hub DSL Leads – Facilitate termly safeguarding CPD and peer support for DSLs within the Trust's three geographical hubs.
  School DSLs – Act as the named Designated Safeguarding Lead at school level.
- The DSL will ensure that staff are made aware of any statutory reporting duties applicable to their role, including mandatory reporting requirements

relating to child sexual abuse under the Crime and Policing Act 2026, and will support staff to understand the distinction between internal safeguarding reporting procedures and any individual statutory duty to make a report to an external authority.
- All staff – Must be trained and vigilant in recognising and reporting safeguarding concerns.

Designated Safeguarding Lead availability and cover – During term time, the Designated Safeguarding Lead or an appropriately trained deputy will always be available during school hours for staff to discuss safeguarding concerns. Individual schools will make appropriate arrangements for DSL or deputy DSL availability during out-of-hours and out-of-term activities where necessary.

Where, in exceptional circumstances, the DSL or a deputy is not immediately available, this must not delay appropriate safeguarding action. Staff should speak to a member of the senior leadership team and/or seek advice from local authority children's social care. In an emergency or where a child is in immediate danger, the police must be contacted immediately.

The Trust and individual schools will ensure that DSL cover arrangements are clear to all staff and that responsibility for safeguarding does not depend solely upon the availability of one individual.

Multi-Agency Working - Effective safeguarding requires strong partnership working between education settings, families and safeguarding agencies.

The Trust and its schools will work collaboratively with local authorities, children's social care, Family Help services, health professionals, police, safeguarding partnerships and other relevant agencies to safeguard and promote the welfare of children.

Staff will contribute appropriately to assessments, information sharing, safeguarding enquiries, child protection processes, Family Help assessments, multi-agency meetings, planning and review arrangements where this supports the safety, wellbeing and best interests of the child.

Information will be shared in a timely, proportionate and lawful manner in accordance with safeguarding and data protection requirements. Concerns about information sharing must never delay action required to protect a child from harm.

The Trust recognises that no single agency can safeguard children effectively in isolation and is committed to a coordinated multi-agency approach to safeguarding and promoting children's wellbeing.

The Trust recognises the strengthened role of education within local multi-agency safeguarding arrangements under the Children Act 2004, as amended by the Children's Wellbeing and Schools Act 2026. The Trust and its schools will participate appropriately in local safeguarding arrangements, contribute to agreed safeguarding priorities and processes, and ensure that the views and safeguarding intelligence of education settings are represented where required.

The Trust and its schools will cooperate with multi-agency child protection teams established under the Children Act 2004, as amended by the Children's Wellbeing and Schools Act 2026, in accordance with applicable commencement provisions, regulations, statutory guidance and local safeguarding arrangements. Staff will contribute relevant information and

professional expertise where required to support effective child protection assessment, planning and decision-making.

3. Reporting Concerns

All safeguarding concerns must be reported immediately via MyConcern to the school's DSL or Deputy DSL. The DSL or deputy DSL will assess the concern using the Staffordshire Safeguarding Children Partnership Right Help, Right Time Framework and determine the appropriate safeguarding response. Where a professional referral to Staffordshire Children's Social Care is required, this will be made using the current Staffordshire Multi-Agency Referral Form (MARF) arrangements. Where urgent safeguarding advice or immediate action is required, the DSL will follow the current Staffordshire emergency referral arrangements. Where a child is in immediate danger or there is an immediate risk to life, the Police must be contacted on 999. The Emergency Duty Service should be contacted for urgent out-of-hours safeguarding concerns.

Mandatory reporting of child sexual abuse

The Trust recognises the statutory mandatory reporting duty for child sexual abuse introduced by the Crime and Policing Act 2026. Where an individual undertaking relevant activity becomes subject to the statutory duty because the circumstances specified in the legislation are met, they must make the required notification to the relevant police force or local authority, or both, as soon as reasonably practicable and within any applicable statutory timeframe and in accordance with the legislation and any statutory guidance issued by the Secretary of State.

The statutory reporting duty applies to the individual undertaking relevant activity. Recording a concern on MyConcern or reporting it internally to the Designated Safeguarding Lead does not, by itself, constitute the statutory notification. However, the legislation provides that a further notification is not required where the individual has confirmed that the required report has already been made, or will be made within the period permitted by the legislation. Staff must therefore follow the Trust's internal safeguarding procedures while ensuring that any statutory reporting duty applicable to them has been, or will be, discharged in accordance with the Crime and Policing Act 2026 and associated statutory guidance.

Nothing in this policy prevents or discourages a person from making a report required by law. No person acting on behalf of the Trust or an academy may prevent, obstruct, discourage or seek to deter an individual from making a report that they are required to make under the Crime and Policing Act 2026.

Where appropriate, the DSL should support staff in understanding and complying with the statutory reporting requirements; however, responsibility for complying with an individual statutory reporting duty remains with the person to whom that duty applies. Other safeguarding action, including referrals to children's social care and/or the police, must continue in accordance with KCSIE, Working Together to Safeguard Children and local safeguarding procedures.

Family Help and early support

All staff should be prepared to identify children who may benefit from help and support as soon as a problem emerges.

In accordance with Working Together to Safeguard Children 2026 and KCSIE 2026, staff should understand the distinction between:

- support available through universal services and community-based early help;
- targeted early help delivered through Family Help; and
- statutory support and services delivered under section 17 of the Children Act 1989.

Family Help brings together targeted early help and support provided to children in need under section 17 into a more integrated offer for children and families.

Where a member of staff believes that a child or family may benefit from Family Help, this should be discussed with the DSL or deputy DSL without delay. The DSL will use the Staffordshire Safeguarding Children Partnership Right Help, Right Time Framework and associated escalation process when considering the level of need, support and safeguarding response required, and will follow current Staffordshire referral pathways.

Staff may be required to contribute to Family Help assessments and plans and, where appropriate, to act as a lead practitioner. Cases receiving Family Help will be kept under regular review. Where a child's circumstances deteriorate or there are concerns that the child is suffering or likely to suffer significant harm, an immediate referral to local authority children's social care will be considered.

The need for parental consent for Family Help does not prevent staff from making a safeguarding referral where a child is suffering or is likely to suffer significant harm.

Attendance and Safeguarding

The Trust recognises that regular attendance is a key protective factor in safeguarding children and promoting their wellbeing.

Persistent absence, severe absence, repeated lateness, patterns of non-attendance or children missing education may indicate unmet needs, abuse, neglect, exploitation, mental health concerns, family difficulties or other safeguarding risks.

Schools will monitor attendance carefully, identify concerns at the earliest opportunity and work proactively with families, Family Help services and partner agencies to reduce barriers to attendance.

Attendance concerns will always be considered within the wider safeguarding context and escalated through safeguarding procedures where appropriate.

Where attendance patterns indicate emerging needs, consideration will be given to appropriate support through universal services, Family Help arrangements or referral to statutory services where required.

Alternative Provision

Where a school commissions alternative provision for a pupil, responsibility for safeguarding that pupil remains with the commissioning school.

Before a placement begins, the school will undertake and record appropriate due diligence and safeguarding and suitability checks and will obtain appropriate written assurance regarding the provider's safeguarding arrangements, including relevant safer-recruitment arrangements.

The school must know where the pupil is receiving education and who is responsible for them during the placement. Attendance, absence and safeguarding information must be shared and monitored through agreed arrangements between the school and provider.

The safety, suitability and effectiveness of each alternative provision placement will be reviewed at least half-termly, including consideration of attendance, safeguarding, educational progress and the pupil's views. A placement will be reviewed immediately where safeguarding concerns arise.

Any safeguarding concern relating to a pupil attending alternative provision must be managed in accordance with this policy and must not be treated solely as a matter for the alternative provision provider.

4. Safer Recruitment, Volunteers and Allegations

The Trust will undertake recruitment and selection in accordance with Part Three of Keeping Children Safe in Education 2026, relevant legislation and Trust safer-recruitment procedures.

Appropriate pre-appointment checks will be undertaken and recorded on the Single Central Record. Recruitment processes will be designed to deter, reject or identify people who may pose a risk of harm to children.

At least one person who conducts an interview for a role involving work with children will have completed appropriate safer-recruitment training.

As part of the Trust's recruitment due diligence, consideration will be given to carrying out online searches on shortlisted candidates in accordance with Keeping Children Safe in Education and the Trust Safer Recruitment Policy.

Regulated activity and volunteers

From 1 September 2026, amendments made by the Crime and Policing Act 2026 remove the previous "supervision exemption" from regulated activity relating to children.

A person volunteering in a role involving teaching, training, instructing, caring for or supervising children will be engaging in regulated activity where the activity meets the statutory frequency or period conditions, including where it is carried out on more than three days in a 30-day period or overnight, regardless of whether the volunteer is supervised.

The Trust and its schools will assess every volunteer role against the statutory definition of regulated activity and obtain the appropriate level of DBS and barred-list information where legally permitted and required.

Schools must not rely on supervision alone as a reason for treating otherwise qualifying frequent volunteer activity as outside regulated activity.

Occasional volunteers and other roles will be assessed individually in accordance with KCSIE and Disclosure and Barring Service guidance.

Existing volunteer arrangements will be reviewed where necessary to ensure compliance with the amended regulated-activity framework.

Allegations and concerns about adults

Safeguarding concerns and allegations relating to staff, supply staff, trainee teachers, contractors, governors or volunteers will be managed in accordance with Part Four of KCSIE

2026, Trust procedures and, where appropriate, in consultation with the Local Authority Designated Officer.

Low-level concerns that do not meet the harm threshold will be recorded and managed in accordance with the Trust's Low-Level Concerns Policy.

5. Training and CPD

All staff, including staff who do not work directly with children, will receive safeguarding and child protection training at induction. This training will include online safety, the school's arrangements for filtering and monitoring, staff behaviour and conduct, internal safeguarding reporting procedures, statutory reporting duties applicable to their role, including the mandatory reporting requirements introduced by the Crime and Policing Act 2026 where applicable, and whistleblowing procedures.

Safeguarding training will be updated at least annually, with safeguarding and child protection updates provided regularly throughout the year as required.

From 1 September 2026, all staff must read and understand Part One of Keeping Children Safe in Education 2026. The DfE Part One overview may be used as an additional quick-reference resource but does not replace the requirement to read Part One in full.

Staff will confirm that they have read and understood the relevant safeguarding information and will be given an opportunity to seek clarification where required.

The DSL and deputy DSLs will undertake training appropriate to their role at least every two years and will update their knowledge and skills at regular intervals, and at least annually, through meetings, bulletins, training and other relevant safeguarding updates.

The Trust DSL and Hub DSL Leads will coordinate termly safeguarding CPD and will ensure that Trust-wide training reflects changes to legislation, statutory guidance, local safeguarding arrangements and emerging safeguarding risks.

Trustees and Governors

The Trust Board will identify a senior board-level lead to take leadership responsibility for the Trust's safeguarding arrangements.

All trustees and Local Academy Council governors will receive appropriate safeguarding and child-protection training, including online safety, at induction. This training will equip trustees and governors with the knowledge required to provide appropriate strategic challenge and assurance that safeguarding policies, procedures and practice are effective.

Safeguarding knowledge will be updated regularly through appropriate Trust-wide training, briefings, safeguarding assurance information and updates to statutory guidance and local safeguarding arrangements.

6. Confidentiality, Information Sharing and Record-Keeping

Safeguarding records will be maintained securely using MyConcern and will be accessible only to those who require access for safeguarding purposes.

All safeguarding concerns, discussions, decisions and the reasons for those decisions will be recorded in writing. Records should include, as appropriate:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- actions taken;
- decisions reached and the rationale for those decisions; and
- the outcome.

The Trust recognises that effective information sharing is essential to identifying and responding to safeguarding concerns. Staff must not assume that somebody else will share information that may be critical to keeping a child safe.

Statutory information-sharing duties
The Trust and its schools will comply with applicable statutory information-sharing duties under the Children Act 2004, as amended by the Children's Wellbeing and Schools Act 2026, as and when those provisions are commenced. Where the statutory conditions are met, relevant safeguarding information must be disclosed to another relevant person where the disclosure may facilitate the exercise of functions or provision of services relating to safeguarding or promoting the welfare of children.

Staff must have regard to applicable statutory guidance and information standards when sharing safeguarding information. Data protection legislation and duties of confidentiality must be applied alongside, and not used as an inappropriate barrier to, lawful safeguarding information sharing.

The Trust will keep its information-sharing arrangements under review as the relevant provisions of the Children's Wellbeing and Schools Act 2026, associated statutory guidance and information standards are brought into force.

Information will be shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure. Decisions to share information, and decisions not to share information where sharing has been considered, should be appropriately recorded.

The Trust will comply with applicable data protection legislation, including the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025. Data protection law does not prevent the sharing of information for the purpose of safeguarding and promoting the welfare of children where there is a lawful basis for doing so.

Staff who are uncertain about whether information should be shared should seek advice from the DSL and/or Data Protection Officer. Concerns about sharing information must never be allowed to delay action necessary to protect a child from harm.

Where a child transfers to another school or college, their child protection file will be transferred securely, separately from the main pupil file and within the timescales set out in KCSIE. Confirmation of receipt will be obtained.

7. Restrictive Interventions, Reasonable Force, Restraint and Seclusion

SUAT is committed to creating safe, supportive and inclusive environments which minimise the need for restrictive intervention. Schools will prioritise preventative approaches, positive relationships, appropriate reasonable adjustments and de-escalation.

The Trust has a separate Physical Restraint/Restrictive Interventions Policy, which should be read alongside this Safeguarding Policy. It sets out the Trust's arrangements for the use of reasonable force, restraint, seclusion and other restrictive interventions, including prevention and de-escalation, staff responsibilities, recording, parental notification, post-incident support and governance oversight.

The Trust and its schools will follow the Department for Education guidance Restrictive interventions, including use of reasonable force, in schools, effective from 1 April 2026, together with the statutory recording and reporting requirements applying to significant incidents involving the use of force, restraint and seclusion.

Restrictive intervention must never be used as a punishment. Any intervention must be lawful, reasonable, proportionate to the circumstances and used for no longer than is necessary.

Particular consideration will be given to the individual needs of children with SEND, disabilities, medical conditions, communication needs, mental health needs or other vulnerabilities, including the Trust's duties under the Equality Act 2010.

Safeguarding Children with SEND and Additional Needs

The Trust recognises that children with special educational needs and disabilities (SEND), communication needs, neurodivergence, medical conditions and other additional vulnerabilities may face increased barriers to recognising abuse, reporting concerns or communicating what has happened to them.

Staff will maintain an attitude of professional curiosity and ensure safeguarding responses are tailored to the individual needs, communication preferences and circumstances of the child.

Safeguarding arrangements will be inclusive, accessible and responsive to the needs of all children. Particular consideration will be given to ensuring that children with SEND understand how to seek help, how to report concerns and how safeguarding processes will be explained in a way that is appropriate to their needs.

In line with the Trust's commitment to *Every Child Known, Every Child Learning and Every Child Flourishing*, safeguarding practice will promote participation, inclusion, wellbeing and positive outcomes for all children.

Safeguarding concerns arising from restrictive intervention

Any concern that force, restraint, seclusion or another restrictive intervention was unnecessary, excessive, punitive, disproportionate or otherwise inappropriate must be treated as a potential safeguarding concern and reported immediately to the Designated Safeguarding Lead.

Where the concern relates to the conduct of a member of staff, the Trust's procedures for managing allegations and low-level concerns about adults working with children will be followed, including referral to the LADO where appropriate.

All significant incidents involving the use of force, and incidents of restraint or seclusion which fall within the statutory recording requirements, must be recorded and reported in accordance with the Trust's Physical Restraint/Restrictive Interventions Policy.

8. Policy Monitoring, Safeguarding Assurance and Governance

This policy is reviewed annually by the Trust DSL and the SLT. School-specific appendices are updated annually or when staff changes occur.

The Trust Board has strategic responsibility for ensuring that safeguarding arrangements are effective across all schools within Staffordshire University Academies Trust.

The Trust will maintain robust safeguarding assurance processes to provide oversight of safeguarding practice, compliance and culture across all schools.

Regular safeguarding assurance information will be reported through Trust governance arrangements and may include:

- safeguarding and child protection activity;
- Family Help involvement;
- attendance, persistent absence and children missing education;
- child-on-child abuse;
- online safety and filtering and monitoring assurance;
- allegations and low-level concerns regarding adults working with children;
- restrictive interventions;
- safeguarding training and compliance;
- safeguarding audits, reviews and external assurance activity; and
- emerging safeguarding risks and trends.

Significant safeguarding risks identified through school audits, reviews, inspections, complaints, incidents or assurance activities will be escalated through Trust governance processes where appropriate.

The Trust Board will use safeguarding assurance information to support continuous improvement and ensure that safeguarding remains effective, responsive and child-centred across all schools.

Safeguarding Risk Management and Escalation

The Trust recognises that effective safeguarding requires the identification, monitoring and management of safeguarding risks at both school and Trust level.

Schools will maintain appropriate oversight of safeguarding risks through their safeguarding, attendance, behaviour, SEND, health and safety and welfare arrangements.

Significant safeguarding risks, emerging safeguarding concerns or recurring safeguarding themes will be reported through appropriate school and Trust governance processes.

Where safeguarding risks have the potential to affect multiple schools, statutory compliance, pupil welfare or Trust reputation, these will be considered through the Trust's risk management and assurance arrangements.

The Trust will use safeguarding data, audits, reviews, complaints, incidents, stakeholder feedback and external assurance findings to identify trends, strengthen safeguarding practice and support continuous improvement.

Safeguarding risk management arrangements will support the Trust's commitment to ensuring that every child is known, every child is learning and every child is flourishing.

9. Appendices

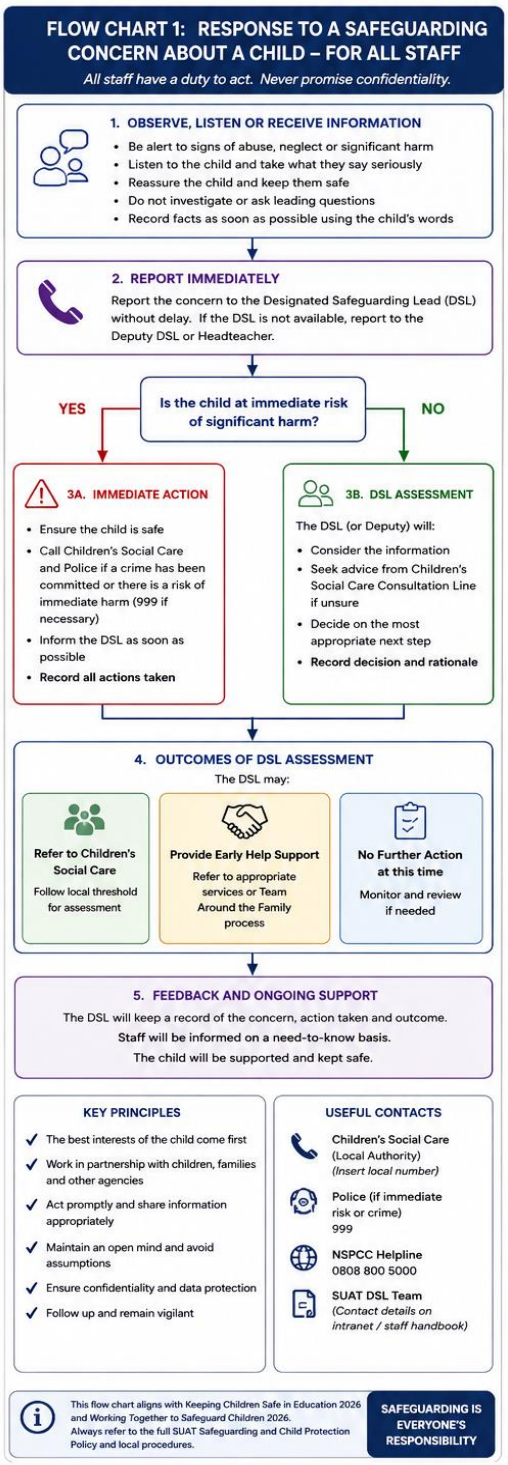
A – Key Contacts
B – Safeguarding Flowchart for Practitioners
C – Safeguarding Flowchart for DSLs
D - Definitions and Indicators of Abuse
E - Specific safeguarding issues
F - Allegations about a Member of Staff (Incl supply), Governor or Volunteer
G - Susceptibility to Radicalisation and Extremism
H - SPOC Contacts
I - Role of the Staffordshire LADO
J - Useful Safeguarding Contacts

Appendix A – Key Contacts

- Staffordshire Children's Social Care – professional safeguarding referrals: use the current Staffordshire Multi-Agency Referral Form (MARF) and Right Help, Right Time referral arrangements. SFIFD contact details should be used for urgent advice in accordance with current Staffordshire procedures.
- LADO: staffordshire.lado@staffordshire.gov.uk
- NSPCC Whistleblowing Helpline: 0800 028 0285
- Trust DSL: Sam Ashley sashley@suatrust.co.uk
- Hub DSL Leads: Anna Elkin, Helen Grundy and Vicky Jackson

Appendix B- Safeguarding Flowchart for All Staff

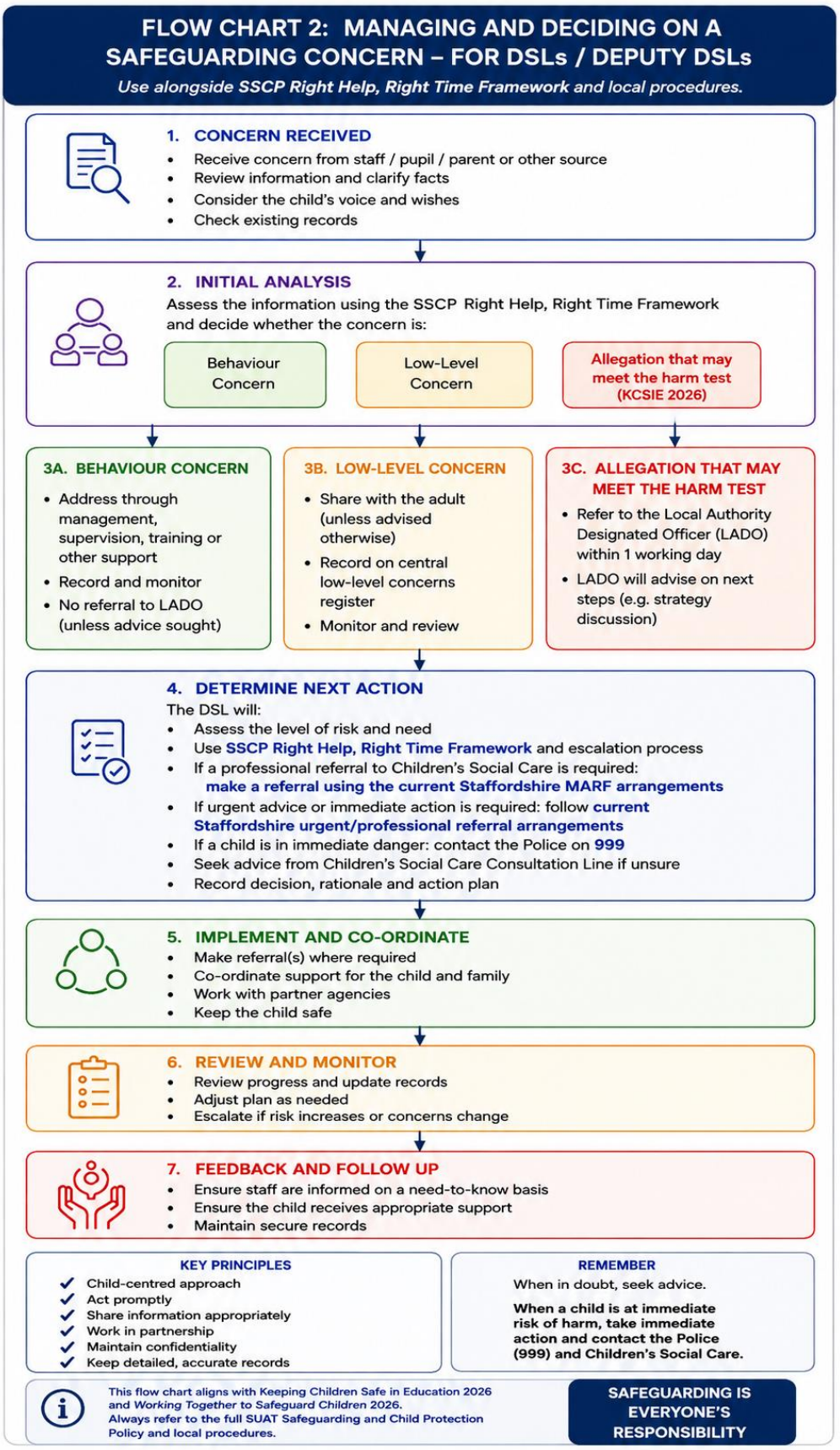
The following flowchart should be used by all staff when responding to a safeguarding concern about a child. All staff have a responsibility to act promptly, report concerns without delay and follow the school's safeguarding and child protection procedures.



Appendix C – Safeguarding Flowchart for Designated Safeguarding Leads and Deputy Designated Safeguarding Leads

The following flowchart should be used by Designated Safeguarding Leads and Deputy Designated Safeguarding Leads when assessing and responding to safeguarding concerns. It should be used alongside this policy, the Staffordshire Safeguarding Children Partnership Right Help, Right Time Framework and Escalation Process, and current local referral procedures.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, appropriate action must be taken without delay.



Staffordshire Local Safeguarding Tools and Procedures

DSLs and deputy DSLs will use current Staffordshire Safeguarding Children Partnership tools, referral pathways and procedures when assessing and responding to safeguarding concerns.

Where neglect is suspected, the Staffordshire Child Neglect Screening Tool should be completed in accordance with current local guidance and used to inform whether further assessment, including use of Graded Care Profile 2 (GCP2), is appropriate.

Where child exploitation is suspected, DSLs will use the current Staffordshire child-exploitation screening and assessment arrangements, including the Child Exploitation (CE) Active Risk Screening Tool and CE Intelligence Form where applicable, and will follow current MACE and referral procedures.

These tools support professional judgement and do not replace the need to make an immediate safeguarding referral or contact the Police where a child is suffering, or is likely to suffer, significant harm or is in immediate danger.

Appendix D – Types of Abuse and Neglect

1. **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 as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.

- Adolescent neglect
- Affluent neglect

Educational Neglect

Educational neglect may occur where a parent or carer persistently fails to ensure that a child receives an appropriate education or repeatedly fails to engage with reasonable support intended to improve school attendance and educational participation.

Indicators may include:

- persistent absence or severe absence from school;
- repeated failure to engage with attendance support and intervention;
- failure to secure suitable education for a child of compulsory school age;
- a lack of parental engagement with concerns regarding attendance, education or welfare; and
- circumstances where educational needs are consistently unmet in a way that may adversely affect the child's welfare, development or future outcomes.

Concerns regarding educational neglect should be considered within the wider safeguarding context and may require support through Family Help arrangements or referral to children's social care where safeguarding concerns are identified.

2. 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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

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

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

4. 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 children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.

- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

Parental response

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child’s means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting.
- Misappropriation of a child’s finances; or
- Inappropriate invasive procedures.

Appendix E – Specific Safeguarding Issues

Behaviours linked to safeguarding issues

All staff have an awareness of safeguarding issues that can put children at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Bullying, including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist, or homophobic remarks, threats, name-calling)
- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying, including online harassment and the sharing of harmful or inappropriate content

Guidance on bullying can be:

- Preventing & tackling bullying
- Cyberbullying advice

Child-on-Child Abuse, including Harassment and Violence

All staff have the knowledge and awareness that children are capable of abusing other children (including online). All staff are clear about the Trust's and their school's procedures regarding child-on-child abuse. The Trust has a separate Child-on-Child Abuse Policy, which should be read alongside relevant behaviour and anti-bullying policies.

Child-on-child abuse may include harassment, violence, harmful sexual behaviour, sexual harassment and sexual violence. Abuse can occur on a continuum, and inappropriate or abusive behaviours can escalate if they are not identified and challenged at an early stage. The Trust and its schools adopt a zero-tolerance approach to child-on-child abuse. This means that such behaviour is never acceptable and will always be responded to; it does not mean that every incident will result in the same response or sanction.

The Trust and its schools adopt a zero-tolerance approach to child-on-child abuse. This means that abusive, inappropriate or discriminatory behaviour is never acceptable and will always be challenged and responded to appropriately. Zero tolerance does not mean that every incident will result in the same response or sanction; responses will be proportionate to the circumstances, the needs of the children involved and the level of safeguarding risk.

Staff must never dismiss abusive or harmful behaviour as "banter", "part of growing up", "just having a laugh" or "boys being boys". Staff will challenge inappropriate and discriminatory behaviour, including sexism, racism, misogyny, misandry, homophobia, biphobia, faith-based prejudice and other derogatory behaviour. Staff will recognise that inappropriate attitudes and behaviours, including misogyny and sexualised behaviour, can escalate if they are not identified and challenged at an early stage.

The Trust recognises that the absence of reports does not mean that child-on-child abuse is not taking place. Children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and may not recognise their experiences as harmful. Staff will therefore maintain professional curiosity, remain alert to indicators of abuse and act on concerns even where a child has not made a direct disclosure. Staff must not develop inappropriate thresholds for taking safeguarding action.

The initial response to a child reporting abuse is extremely important. Children who report abuse will be listened to, taken seriously and reassured that they will be supported and kept safe. They will never be made to feel that they are creating a problem by making a report or that they should feel ashamed. Abuse that occurs online or outside school will be treated as seriously as abuse that occurs within the school.

Schools will maintain well-promoted, accessible and age-appropriate systems for children to report concerns. Children will be supported to understand how and to whom they can report a concern and will be reassured that concerns will be responded to appropriately. The voice, wishes and individual circumstances of the child will be considered throughout the safeguarding response.

Staff will recognise that some children may be more vulnerable to child-on-child abuse or may face additional barriers to reporting it, including children with SEND and other additional needs. Safeguarding responses will therefore be child-centred, inclusive and responsive to the needs and circumstances of the children involved.

Reports of child-on-child abuse will be recorded, assessed and responded to in accordance with this policy and the Trust's Child-on-Child Abuse procedures. Appropriate consideration will be given to the safeguarding, welfare and support needs of the child who has experienced the abuse, the child alleged to have caused the harm, siblings and any other children who may be affected. Risk assessment and safety planning will be undertaken where appropriate.

Where a member of staff has a concern about child-on-child abuse, or a child makes a report to them, the concern must be reported to the Designated Safeguarding Lead or deputy DSL without delay. Appropriate action under the school's Behaviour Policy may form part of the response but must never replace or delay necessary safeguarding action.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering

with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.

- consensual and non-consensual making or sharing of nude or semi-nude images and/or videos, including images which have been digitally altered or wholly generated using artificial intelligence, including so-called deepfakes or deep nudes. Every incident involving the making or sharing of nude or semi-nude imagery requires a safeguarding response, whether the making or sharing is described as consensual or non-consensual. The nature and proportionality of that response will depend on the circumstances, age and needs of the children involved, the presence or absence of coercion, the nature of the imagery and any associated safeguarding risks. Staff must not view, copy, print, forward or otherwise unnecessarily handle such imagery and must report concerns immediately to the DSL in accordance with the school's safeguarding procedures and current UKCIS guidance.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

Staff will consider the wider safeguarding context of child-on-child abuse, including any intra-familial harm and the safeguarding and support needs of siblings and other children who may be affected.

All staff must understand the Trust's and their school's procedures for preventing and responding to child-on-child abuse. Where a member of staff has a concern about a child, or a child makes a report to them, they must follow the safeguarding reporting procedures set out in this policy and report the concern to the DSL or deputy DSL without delay. Appropriate action under the school's Behaviour Policy may form part of the response but must not replace or delay necessary safeguarding action.

Guidance Documents:

- Disrespect No Body campaign
- CEOP-Safety centre
- UKCIS Guidance: Sharing Nudes and Semi-Nudes
- Review of sexual abuse in schools and colleges - GOV.UK
- Searching, screening and confiscation in schools
- Sharing nudes and semi-nudes: advice for education settings
- Undressed (lgfl)

Children who are questioning their gender

Children who are questioning their gender may require sensitive, child-centred and individualised support. Staff should maintain professional curiosity and must not make assumptions about a child's circumstances, experiences or safeguarding needs.

The welfare and best interests of the child will remain the primary consideration. Schools will take appropriate action to safeguard children from bullying, harassment, discrimination, abuse or exploitation and will ensure that the child's wishes, feelings, individual needs and wider circumstances are appropriately considered.

Where a child makes a request relating to social transition, including requests concerning names, pronouns, uniform, facilities, single-sex spaces, sport or other school arrangements, the school will respond carefully and proportionately in accordance with current Keeping Children Safe in Education and other applicable

Department for Education guidance. Parents and carers will ordinarily be appropriately involved in decisions affecting their child unless there is a safeguarding reason why doing so would place the child at risk of significant harm.

Any safeguarding concern arising in connection with a child questioning their gender must be reported to the DSL or deputy DSL in accordance with this policy.

Children Missing Education

All professionals working with children, as well as the wider community can help by remaining vigilant to children's safety. The law states every child should be receiving an education, and we stand a better chance of ensuring a child's safety if we know where and how they are receiving this. The Education and Inspections Act 2006 places a duty on local authorities in England and Wales to make arrangements to identify children and young people of compulsory school age missing education in their area; we work closely to ensure we put appropriate safeguarding responses in place for children who go missing from education.

A child going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

Our school holds at least 2 emergency contact numbers for each pupil. If a child goes missing from our school and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some children.

Where a child is believed to be missing from the school site and their whereabouts cannot be established following the school's agreed procedures and reasonable enquiries, the school will take immediate action to safeguard the child. Parents/carers will be informed as appropriate; however, the school will not rely solely on parents/carers to report the child missing to the Police. Where the child's whereabouts remain unknown, or there are concerns for the child's safety or welfare, the school will contact the Police directly in accordance with its procedures.

Each school will maintain clear procedures for responding to a child who goes missing from the school site. All staff must understand these procedures, their individual responsibilities and the action they are required to take. Accurate and timely registration is an important safeguarding measure; class and session registers must therefore be completed promptly in accordance with the school's attendance procedures.

Any missing episode will be considered in the context of the child's individual circumstances and any known safeguarding risks. Where appropriate, the DSL or deputy DSL will consider whether further safeguarding action, including referral to Children's Social Care or other relevant agencies, is required.

The school will notify and work with the Local Authority in accordance with statutory attendance and children missing education requirements where a pupil fails to attend regularly, is absent without explanation, or where reasonable enquiries have failed to establish the child's whereabouts. Safeguarding action will not be delayed pending the expiry of any attendance-related notification period where there are concerns about a child's safety or welfare.

The school (regardless of designation) will also notify the Local Authority of any pupil/student who is to be deleted from the admission register because s/he:

- Has been taken out of school by their parents and is being educated outside the school system (e.g., elective home education);
- Has ceased to attend school and no longer lives within a reasonable distance of the school at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the school of the change);
- Displaced because of a crisis e.g., domestic violence or homelessness;
- Has been permanently excluded.

Our school will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing'.

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeated occasions can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Where absence, persistent absence or patterns of absence indicate emerging needs, the school will consider whether support through universal services, community-based early help or Family Help is appropriate. Where absence indicates that a child may be suffering or likely to suffer harm, a referral to local authority children's social care will be made without delay.

Attendance concerns will be considered alongside the child's wider circumstances, including known safeguarding concerns, SEND, mental health, exploitation, domestic abuse, homelessness, family circumstances and involvement with other agencies.

Further information and support, includes:

- Working together to improve school attendance including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children missing education .
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time enrolment of 14 to 16-year-olds in further education and sixth-form colleges
- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults strategy.

Child Missing from Home or Care

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document:

- Children who run away or go missing from home or care

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The Trust recognises that exploitation may be hidden and that children who have been criminally or sexually exploited may not identify themselves as victims. Apparent compliance or participation does not mean that exploitation has not occurred.

Schools will use current local child-exploitation risk-assessment tools and procedures where appropriate and will contribute to local multi-agency arrangements, including relevant exploitation or MACE processes, where a child is at risk.

Concerns about exploitation will be recorded and referred in accordance with Staffordshire Safeguarding Children Partnership procedures. Where there is an immediate risk of

significant harm or crime, the police and/or local authority children's social care will be contacted without delay.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm, from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late.
- children who regularly miss school or education or do not take part in education.

Guidance documents:

- Safeguarding children who may have been trafficked
- **Staffordshire Safeguarding Children Partnership – current child exploitation guidance/procedures**

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents:

- Child Sexual Exploitation Definition & Guidance
- Know about CSE

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

> One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRM) should be considered via the Police. Further information can be found here National Referral Mechanism

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance Document:

- Criminal Exploitation of Children and Vulnerable Adults; County Lines
- County Lines toolkit

Domestic Abuse

Domestic abuse includes abusive behaviour between people aged 16 or over who are personally connected to each other. Abuse may consist of a single incident or a course of conduct and may include physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse and psychological, emotional or other abuse. Children who see, hear or experience the effects of domestic abuse are recognised as victims of domestic abuse in their own right.

This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. Children affected by domestic abuse will be provided with appropriate safeguarding and pastoral support and, where necessary, referred or signposted to relevant specialist services.

Operation Encompass

The Trust recognises that a child who sees, hears or experiences the effects of domestic abuse is recognised as a victim of domestic abuse in their own right under the Domestic Abuse Act 2021.

Operation Encompass is a statutory information-sharing arrangement through which police notify a relevant educational establishment where they have reasonable grounds to believe that a child may be a victim of domestic abuse following a domestic abuse incident.

Notifications may relate to a child who was present during an incident or to a child connected to the household who was not physically present.

Each school will nominate an appropriately trained Key Adult, normally the DSL or deputy DSL, to receive and manage Operation Encompass notifications.

Schools will ensure appropriate arrangements are in place for:

- receiving and checking notifications;
- securely recording the information;

- considering the voice, experience and individual needs of the child;
- providing sensitive and proportionate pastoral and safeguarding support;
- sharing information only with staff who need it in order to safeguard or support the child; and
- considering whether additional safeguarding action or referral is required.

An Operation Encompass notification does not replace normal safeguarding procedures. Where the information indicates that a child has suffered or is likely to suffer harm, the DSL will take appropriate action in accordance with this policy and local safeguarding procedures.

Guidance Documents:

- Domestic Violence and Abuse
- NSPCC-Domestic Abuse
- Operation Encompass helpline 0204 513 9990 (8am-1pm Mon-Fri)

Drugs

Alcohol and substance misuse may place children at increased risk of harm and may be associated with other safeguarding concerns, including exploitation, criminal activity, poor attendance and adverse health outcomes. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- NSPCC-Parental Substance Misuse
- Drugs Advise for Schools

Fabricated or Induced Illness (FII)

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child.

NHS-Overview-Fabricated or Induced Illness

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will **not** replace a referral into children's social care where a child has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 yr olds could be living independently from their parents or guardians and they will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL will ensure that appropriate referrals are made based on the child's circumstances.

Temporary Accommodation Notification Duty

The Children's Wellbeing and Schools Act 2026 places a duty on local housing authorities in England to notify relevant educational institutions when a child is placed in temporary accommodation where the required consent to share the information has been given.

Consent may be provided by a parent or person with parental responsibility or care of the child, or by a 16- or 17-year-old who is living independently from their parents.

Where a school receives a notification that a pupil has been placed in temporary accommodation, the information will be brought to the attention of the DSL and appropriate staff on a need-to-know basis.

The school will consider whether the child requires additional or different support in relation to safeguarding, welfare, attendance, transport, health, wellbeing, educational participation, SEND or pastoral needs.

Receipt of a temporary accommodation notification does not replace the school's existing safeguarding responsibilities. Where there is concern that a child has suffered or is at risk of harm, an appropriate referral to local authority children's social care will be made.

Honour-based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors, when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse".

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to

report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

Guidance Documents: -

- Multi Agency Statutory guidance on Female Genital Mutilation
- Female Genital Mutilation Act 2003

Forced Marriage

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

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life'. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

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

School and college staff can contact the Forced Marriage Unit for advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Guidance Document:

- Forced Marriage

- The right to choose: government guidance on forced marriage

Mental Health

All staff have an important role to play in supporting the mental health and wellbeing of our pupils and are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Each school will maintain clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

The school will have clear systems and processes for identifying and responding to children who may require mental health support.

Staff are not expected to diagnose mental health conditions. However, education staff are well placed to identify changes in behaviour, presentation, attendance, relationships or engagement which may indicate that a child is experiencing a mental health difficulty or may require additional support.

Mental health concerns will be considered in the context of the child's wider circumstances and experiences. Staff recognise that experiences of abuse, neglect, exploitation, discrimination, bullying, domestic abuse and other adverse experiences can have a lasting impact on a child's mental health, behaviour and education.

The school will work with parents, health services, children's social care and other agencies as appropriate, while ensuring that the voice and best interests of the child remain central to decision-making.

The Trust recognises that safeguarding contributes to children's long-term wellbeing, resilience, independence and life opportunities.

Through effective safeguarding practice, schools will support children and young people to develop the knowledge, skills, confidence and resilience needed to prepare for adulthood and participate safely in society.

For pupils with SEND and additional vulnerabilities, safeguarding arrangements will take account of their longer-term outcomes and aspirations, including independent living, community participation, friendships and relationships, health and wellbeing, and future education, employment or training.

Schools will work with children, families and partner agencies to ensure that preparation for adulthood is considered as part of wider support, transition planning and safeguarding arrangements where appropriate.

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to **observe** children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

Guidance and helpful documents: -

- Addressing Trauma and Adversity

- Mental Health and Behaviour in Schools Guidance.
- Preventing and tackling bullying
- Every Interaction Matters
- MIND-Parenting Capacity and Mental Health
- NSPCC-Mental Health and Parenting

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and by speaking to the designated safeguarding lead or a deputy.

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sextortion, sexual predation, and technology often provides the platform that facilitates harm.

The Trust recognises that it is essential to safeguard children from potentially harmful and inappropriate online material. The Trust and its schools will maintain a whole-school approach to online safety that protects and educates pupils and staff in their use of technology and provides clear mechanisms for identifying, intervening in and escalating concerns.

The breadth of risks within online safety is considerable and is considered through the four areas of risk:

- **Content:** exposure to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm and suicide content, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation, fake news and conspiracy theories.
- **Contact:** harmful interaction with other users or with generative AI applications which simulate human interaction. This can include peer pressure, adults or others posing as children, grooming, exploitation, coercion and harmful commercial contact.
- **Conduct:** online behaviour that increases the likelihood of or causes harm, including online bullying and the making, sending, receiving or sharing of explicit images, including consensual or non-consensual nudes or semi-nudes and images which have been altered or generated using artificial intelligence, including deepfakes.
- **Commerce:** risks including online gambling, inappropriate advertising, phishing, scams and other forms of financial exploitation.

Generative Artificial Intelligence

The Trust recognises both the educational opportunities and safeguarding risks associated with generative artificial intelligence.

Any use of generative AI within schools must be consistent with safeguarding, data-protection, information-security, intellectual-property and educational requirements.

Staff will remain alert to risks including:

- inappropriate or harmful AI-generated content;
- AI systems that simulate harmful or exploitative contact;

- grooming or manipulation facilitated through AI;
- the creation or alteration of nude or semi-nude imagery and deepfakes;
- misinformation and disinformation;
- inappropriate disclosure of personal or special-category data;
- bias and discriminatory outputs; and
- circumvention of school filtering and monitoring arrangements.

Where schools permit use of generative AI, they will ensure appropriate risk assessment, staff oversight, pupil education and technical safeguards.

Consideration of these 4Cs (above) will provide the basis for our Online Safety Policy

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have appropriate filtering and monitoring systems in place on school devices and school networks, and these are regulated, and risk assessed as part of the prevent duty.

Filtering and Monitoring

The Trust will ensure that all schools have appropriate filtering and monitoring systems in place and that responsibilities for managing those systems are clearly allocated.

Each school will identify a member of the senior leadership team with overall responsibility for filtering and monitoring. Reviews will be undertaken with the support of the DSL and appropriate IT support.

The effectiveness of filtering and monitoring arrangements will be formally reviewed at least once every academic year.

The review will include practical checks that filtering is operating appropriately on relevant internet-connected devices and in all relevant locations.

Schools will maintain a record of these checks, including:

- the date of the check;
- who undertook it;
- the devices, systems, user profiles or locations checked;
- what was tested;
- the outcome; and
- any remedial action required.

Checks will be informed by the school's safeguarding risk profile and will include appropriate consideration of pupils with additional vulnerabilities and emerging risks, including generative AI.

Filtering arrangements will block illegal, harmful and inappropriate material without unreasonably affecting teaching and learning.

Monitoring arrangements will enable relevant safeguarding concerns to be identified and escalated appropriately.

The leadership team, DSL, relevant staff and IT support must understand the filtering and monitoring arrangements, their respective responsibilities and how concerns are reported and escalated.

The governing body/LAC will receive appropriate assurance that filtering and monitoring arrangements are effective.

Mobile Phones and Smart Technology

From 1 September 2026, schools will follow the Department for Education statutory guidance Mobile phones in schools.

SUAT schools will operate as mobile phone-free environments by default. Pupils should not have access to or use mobile phones during the school day, including during lessons, movement between lessons, breaktimes and lunchtimes, except where an authorised exception applies.

Each school will set out its local arrangements in its Behaviour Policy and/or Mobile Phone Policy, including:

- how mobile phones are stored or secured;
- arrangements for pupils who bring devices to school;
- authorised exceptions, including reasonable adjustments where appropriate;
- sanctions for misuse;
- arrangements for smart watches and other connected communications technology;
- procedures for emergency contact between pupils and parents;
- safeguarding responses where a device is suspected to contain harmful or illegal material; and
- arrangements for searching, screening and confiscation in accordance with current statutory guidance.

Any exception to the default mobile phone-free position will be based on the individual circumstances of the pupil and must not undermine safeguarding arrangements.

Guidance Documents:

- Children's Commissioner-Online Safety
- Teaching online safety in schools
- Appropriate Filtering and Monitoring
- CEOP-Safety Centre
- National Cyber Security Centre
- NSPCC-Undertaking remote teaching safely
- 360 Degree Safe - Online Safety Review Tool
- UKCIS-UK Council for Internet Safety

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Staff in all SUAT schools will notify the DSL or deputy DSL where they become aware of a possible private fostering arrangement The DSL will ensure that Staffordshire Children's Social Care is notified in accordance with statutory requirements and local procedures.

Guidance Document:

- Children Act 1989 – Private Fostering

Kinship Care

The Trust recognises that children may live in a range of formal and informal kinship care arrangements and that their individual circumstances, experiences and support needs must be understood when considering safeguarding, attendance, wellbeing and educational outcomes

.

Staff should not assume that a kinship arrangement is a safeguarding concern in itself. However, where a child living in kinship care has additional needs or safeguarding concerns, the school will work with the child, their carer, the local authority and relevant agencies to ensure appropriate support is considered.

Schools will have regard to relevant local authority arrangements and the support available through the local kinship offer and will cooperate, where appropriate, with arrangements intended to promote the educational achievement, attendance and engagement of children in need and children living in kinship care.

Young Carers

The Trust recognises that children and young people who provide care for a family member may have additional needs and vulnerabilities. Caring responsibilities may affect a child's attendance, punctuality, attainment, behaviour, emotional wellbeing, relationships and ability to participate fully in school life.

Staff should remain alert to indicators that a child may have significant or inappropriate caring responsibilities and should not assume that difficulties with attendance, engagement or behaviour are simply matters of choice or compliance.

Where a young carer is identified, the school will consider the child's individual circumstances and whether support through the school, universal services, Family Help or other relevant agencies is appropriate. Where caring responsibilities give rise to safeguarding concerns, these must be reported to the DSL or deputy DSL and responded to in accordance with this policy**.**

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

The Trust recognises freedom of speech and the lawful expression of beliefs and opinions as important rights. These rights operate within the law and do not extend to speech or conduct that promotes violence, terrorism, unlawful discrimination or harm. Pupils/students and school staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child may be susceptible to radicalisation. Staff must remain professionally curious and consider concerns in the context of the child's individual circumstances, relationships, behaviour, online activity and other relevant safeguarding information. Staff must not rely on stereotypes or treat any individual characteristic, protected characteristic, SEND need, belief, appearance or family circumstance as evidence of susceptibility to radicalisation.

Protecting children from radicalisation is part of the Trust's wider safeguarding responsibilities. Further information about susceptibility to radicalisation, extremist influences and the action staff should take where they have concerns is set out in Appendix G.

Each school's DSL and deputy DSLs will be familiar with local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix G.

Prevent Duty and Channel

Prevent

The governing body/LAC, Headteacher/Principal and DSL will ensure that the school assesses its risk in relation to the Prevent duty and implements proportionate measures to mitigate identified risks. Risk assessment may include consideration of the school's RE curriculum, SEND policy, Assembly Policy, the use of school premises by external agencies, integration of students by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

All schools are subject to a duty to have “due regard to the need to prevent people being drawn into terrorism” (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our schools wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and covers childcare). The Trust and its schools will have regard to the current Prevent Duty Guidance for England and Wales. Senior leaders, DSLs and deputy DSLs will understand the current Prevent framework, including its themes of leadership and partnership, capabilities, and reducing permissive environments. Our school has a Prevent Single Point of Contact (SPOC) who is the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL.

Concerns about possible radicalisation will be treated as safeguarding concerns. Staff will report concerns to the DSL or deputy DSL, who will consider local Prevent referral arrangements.

Where a child is referred to Channel, relevant and proportionate information will be shared with the police and other Channel partners in accordance with statutory guidance and information-sharing requirements.

School-specific safeguarding arrangements

Each SUAT school will identify an appropriately trained member of staff to act as the school’s Single Point of Contact (SPOC), where this role is required. The name and contact details of the current SPOC will be recorded within the school’s local safeguarding appendix and communicated to relevant staff.

Each school will use Trust-approved filtering and monitoring systems appropriate to its context and technological environment. Details of the systems in operation, together with the staff responsible for their oversight, review and escalation arrangements, will be maintained within the school’s local safeguarding and/or online safety arrangements.

All staff will be made aware of the school’s filtering and monitoring arrangements, their responsibilities in relation to these systems, and the procedures for reporting and escalating safeguarding concerns identified through technology.

Channel

Channel is a local authority-led, multi-agency programme that provides support to individuals who are identified as being at risk of being drawn into terrorism. The Channel panel is chaired by the responsible local authority and includes the police and other relevant partners, which may include education, health, children’s and adults’ services and other agencies as appropriate.

Channel aims to:

- Identify individuals who may be vulnerable to being drawn into terrorism;
- Assess the nature and extent of that risk; and
- develop an appropriate, tailored package of support.
- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and

- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- Where staff have concerns that a child may be susceptible to radicalisation, they must report those concerns to the DSL or deputy DSL in accordance with the school's safeguarding procedures. The DSL will consider whether a Prevent referral is appropriate in accordance with local referral arrangements. Prevent referrals are assessed through the statutory Prevent process and, where appropriate, may be progressed for consideration by the local authority-led Channel panel.
- Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Guidance Documents:

- The Prevent Duty.
- Educate Against Hate
- ACT Early | Prevent radicalisation

Serious Violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions may also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff should also be aware of the range of risk factors which may increase the likelihood of involvement in serious violence. These include being frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending.

Where staff have concerns that a child may be at risk from, or involved in, serious violence, criminal exploitation or associated harm, they must report the concern to the DSL or deputy DSL without delay. The child's circumstances and safeguarding needs will be considered holistically and appropriate action will be taken in accordance with this policy and local safeguarding procedures.

Guidance documents:

- Home Office Preventing Youth Violence and Gang Involvement
- Criminal Exploitation of Children and Vulnerable Adults; County Lines

Appendix F - Allegations or Safeguarding Concerns about Staff, including Supply Staff, Trainee Teachers, Volunteers and Contractors

1. Inappropriate behaviour by staff/supply staff/volunteers could take the following forms:

   - **Physical**
     For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects, or rough physical handling.

   - **Emotional**
     For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability, or sexuality.

   - **Sexual**
     For example, sexualised behaviour towards pupils, sexual harassment, inappropriate phone calls and texts, images via social media, sexual assault, and rape.

   - **Neglect**
     For example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.

   - **Spiritual Abuse**
     For example, using undue influence or pressure to control individuals or ensure obedience, follow religious practices that are harmful such as beatings or starvation.

2. If a safeguarding concern or allegation, no matter how small, is raised about a member of staff, supply staff member, trainee teacher, contractor, governor, visitor or volunteer, it must be reported promptly in accordance with the procedures below.

   Where a concern or allegation indicates that an adult may have:

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

   the matter will be considered against the harm threshold and the case manager will consider whether referral to the Local Authority Designated Officer (LADO) is required.

   Where the concern relates to the Headteacher, it must be reported to the Chair of the LAC/appropriate Trust representative. Where it concerns the Chief Executive or another person for whom separate Trust governance arrangements apply, the Trust's agreed allegations procedure will be followed.

   A concern that does not meet the harm threshold will be dealt with in accordance with the Trust's low-level concerns procedures.

Where the individual is supplied, placed or employed by another organisation, including an employment agency, initial teacher training provider or contractor, the school and the third-party organisation share safeguarding responsibilities.

The school remains responsible for safeguarding children, gathering relevant facts and managing its part of the safeguarding process. It will liaise appropriately with the employing agency, training provider or other relevant organisation and with the LADO.

The school will not simply cease to use an individual as an alternative to properly considering and addressing a safeguarding allegation.

3. The Headteacher/Principal will exercise and be accountable for their professional judgement on the action to be taken as follows:

   - If the actions of the member of staff, and the consequences of the actions, raise credible Child Protection concerns the Head Teacher/Principal will notify the Staffordshire Designated Officer **(LADO) (0300 111 8007)**. The LADO will liaise with the Chair of LAC and advise about action to be taken and may initiate internal referrals within Staffordshire Childrens Social Care to address the needs of children likely to have been affected.
   - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the pupil. These should be addressed through the school's own internal procedures.
   - If the Headteacher/Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child safeguarding file.

4. Where we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers). In no circumstances will our school 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 LAC/Trust 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.

5. Where an allegation has been made against the Headteacher/ Principal or Proprietor, then the Chair of the LAC takes on the role of liaising with the LADO in determining the appropriate way forward. Staffordshire Safeguarding Children Partnership – current procedures for managing allegations concerning adults who work with children

6. Where the allegation is against the sole proprietor, the referral should be made to the LADO directly.

Appendix G - Susceptibility to Radicalisation and Extremism

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

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation. Staff should exercise professional curiosity and consider the child's individual circumstances, behaviour, relationships, online activity and any changes or influences which may indicate a safeguarding concern.

Children may be exposed to extremist influences or radicalising content through a range of sources, including online platforms, social media, gaming environments, peer groups, family or community influences and direct contact with individuals or groups. Staff should remain alert to concerning changes in behaviour, language, associations or online activity, particularly where these occur alongside expressions of support for terrorism, extremist violence or an increasing acceptance or justification of violence.

No individual characteristic, behaviour, belief, appearance, protected characteristic, SEND need or family circumstance should be treated in isolation as evidence that a child is susceptible to radicalisation. Staff must avoid stereotyping or discriminatory assumptions and consider concerns within the wider safeguarding context. SEND or disability should not, in itself, be regarded as an indicator of susceptibility to radicalisation.

Possible indicators must always be considered in context. A concern may arise from a combination of factors rather than a single behaviour and the presence of an indicator does not necessarily mean that a child is being radicalised. Equally, staff should not wait for a particular combination of indicators before taking action where they have a safeguarding concern.

Where a member of staff has a concern that a child may be susceptible to radicalisation or is being exposed to extremist influences, the concern must be reported to the Designated Safeguarding Lead or deputy DSL without delay. The DSL will consider the concern in accordance with the Prevent duty, KCSIE, local safeguarding arrangements and current Channel guidance and will determine whether further advice, support or referral is required.

Where there is an immediate risk of harm or suspected terrorist activity, the appropriate emergency or counter-terrorism arrangements must be followed without delay.

Appendix H

SPOC Contacts

Prevent and Channel Contacts

Each school will maintain current local Prevent and Channel contact details within its local safeguarding appendix. Staff should use the most recent contact information published by Staffordshire County Council, Staffordshire Police and the relevant local authority.

Where there is a concern that an individual may be susceptible to being drawn into terrorism, staff should report the concern to the DSL or deputy DSL in accordance with this policy. The DSL will follow current local Prevent referral arrangements.

For advice or to report a concern, Staffordshire Police can be contacted on 101. In an emergency, call 999. The National Prevent Advice Line is 0800 011 3764.

Prevent Leads	Contact Name	Email Address
Cannock	Oliver Greatbach	olivergreatbatch@cannockchasedc.gov.uk
East Staffs	Mike Hovers	Michael.hovers@eaststaffsbc.gov.uk
Lichfield	Yvonne James	Yvonne.James@lichfielddc.gov.uk
Newcastle	Georgina Evans	Georgina.Evans@newcastle-staffs.gov.uk
South Staffs	Maggie Quinn	M.Quinn@sstaffs.gov.uk
Stafford	Victoria Cooper	vcooper@staffordbc.gov.uk
Staffs Moorlands	Paula Goodwin	paula.goodwin@staffsmoorlands.gov.uk
Tamworth	Joanne Sands	joanne-sands@tamworth.gov.uk

Staffordshire County Council (Safer Communities)	Fiona Chapman	fiona.chapman@staffordshire.gov.uk
Staffordshire Police Prevent Team	Sam Cartlidge	prevent@staffordshire.police.uk

Appendix I - Role of the Staffordshire LADO

The Staffordshire LADO (Local Authority Designated Officer) promotes a safer children's workforce by providing effective guidance, advice, and investigation oversight to cases. They **may** be able to offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO and where the broader goals of a safer children's workforce are relevant.

The service will give advice on how concerns or allegations should be investigated, including if a referral needs to be raised with the Police and/or Children's Social Care. Staffordshire LADO is not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together. They will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS.

The current Staffordshire Safeguarding Children Partnership procedures for managing allegations and safeguarding concerns about adults who work with children reflect the relevant statutory safeguarding framework, including Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. These procedures should be followed by all organisations providing services for children and young people.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a child has or has not been harmed.

Guidance for Safer Working Practice is available which will help individuals form judgements on what may constitute behaviour that is unsafe or abusive.

Who to refer concerns to:

All reports of concern or allegation to the Staffordshire LADO (Local Authority Designated Officer) that an adult working or volunteering with children:

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

Step 1: Follow Keeping Children Safe in Education 2026, Part Four and the Trust's procedure for managing safeguarding concerns and allegations about staff, including supply staff, trainee teachers, volunteers and contractors.

- The Headteacher/appropriate case manager will consider whether an onward referral to the Staffordshire LADO is required and will seek LADO advice in accordance with current Staffordshire Safeguarding Children Partnership procedures.

Step 2: Staffordshire Families Integrated Front Door (SFIFD) (SFIFD) Team will ensure that the matter is passed promptly to the Staffordshire LADO Duty Officer and assist in initiating any additional safeguarding activities.

If your concern or allegation is urgent and outside of office hours telephone: 0345 604 2886 (the Emergency Duty Team).

This single referral point will provide a responsive and inclusive service for all children's workforce sectors, focus the advice and support where it is needed most and enable the team to continue to work effectively with partners.

Appendix J - Useful safeguarding contacts

The contact details below are provided for operational safeguarding purposes. Each school must also maintain an up-to-date local safeguarding appendix containing any additional school-specific and local-agency contacts relevant to its setting.

Schools are responsible for ensuring that safeguarding contact information is kept current and that all staff know how to access relevant contact details when required.

- Staffordshire Education Safeguarding Advice Service (ESAS) on 01785 895836 or email esas@staffordshire.gov.uk

- Local Authority Designated Officer (LADO) 0300 111 8007
- Staffordshire Families Integrated Front Door (SFIFD)
- Emergency Duty Services (EDS-out of hours safeguarding concerns) 0345 604 2886 or email eds.team.manager@staffordshire.gov.uk
- Staffordshire Police – 101 for non-emergency safeguarding/police concerns; 999 where there is an immediate risk of harm or emergency.
- Stoke-on-Trent Children's Services: Chat and Advice Service (CHAD) 01782 235100 Emergency Duty Team: 01782 234234 (outside office hours)
- Staffordshire Police coordinator: Mark Hardern Tel: 07539 3636299 Email: mark.hardern@staffordshire.police.uk
- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email prevent@staffordshire.police.uk
- PHSE Coordinator Natalie McGrath natalie@staffscvys.org.uk
- Child Exploitation and Online Protection Centre CEOP & knowaboutcse.co.uk
- NSPCC– 24-hour Child Protection Helpline 0808 800 5000
- Stop It Now! child sexual abuse helpline
- National Domestic Abuse Helpline (run by Refuge) – 0808 2000 247, available 24 hours a day
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. Unicef

National Contacts

- CEOP (Child Exploitation and Online Protection) CEOP Safety Centre
- Professionals Online Safety Helpline – 0344 381 4772 Safer Internet Helpline
- Internet Watch Foundation (IWF) – Internet Watch Foundation
- Safer Internet Centre – helpline@saferinternet.org.uk
- Childline – 0800 1111 Childline
- Ofsted – General enquiries: 0300 123 1231 enquiries@ofsted.gov.uk Safeguarding concerns about an individual child should be referred to children's social care and/or police rather than Ofsted.
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) www.educateagainsthate.com

Linked Guidance

This policy should be read alongside the current versions of relevant legislation and statutory/non-statutory guidance, including:

- Keeping Children Safe in Education 2026, Department for Education
- Working Together to Safeguard Children 2026, Department for Education
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Education and Inspections Act 2006
- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Human Rights Act 1998
- Domestic Abuse Act 2021
- Victims and Prisoners Act 2024, where relevant to Operation Encompass
- Data Protection Act 2018
- UK General Data Protection Regulation
- Data (Use and Access) Act 2025
- Counter-Terrorism and Security Act 2015
- Prevent Duty Guidance: England and Wales
- Female Genital Mutilation Act 2003
- Serious Crime Act 2015
- Forced Marriage legislation and current statutory guidance
- Homelessness Reduction Act 2017
- Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025
- Restrictive interventions, including use of reasonable force, in schools, Department for Education, effective 1 April 2026
- Mobile phones in schools statutory guidance, Department for Education, to be followed from 1 September 2026
- Searching, Screening and Confiscation: Advice for Schools
- Behaviour in Schools: Advice for Headteachers and School Staff
- Department for Education filtering and monitoring standards
- Department for Education digital and technology standards for schools and colleges
- current statutory Early Years Foundation Stage framework, where applicable
- current UKCIS guidance on sharing nudes and semi-nude
- Staffordshire Safeguarding Children Partnership Right Help, Right Time Framework, Escalation Process and current safeguarding procedures.
- Legislation and guidance will be interpreted in accordance with amendments and commencement provisions in force at the relevant time.

Related Trust Policies and Procedures

This Safeguarding Policy should be read alongside the following Trust policies, procedures and guidance documents:

- Child-on-Child Abuse Policy
- Low-Level Concerns Policy

- Staff Code of Conduct
- Whistleblowing Policy
- Safer Recruitment Policy
- Behaviour Policy
- Anti-Bullying Policy
- Online Safety Policy
- Acceptable Use Policy
- Data Protection Policy
- Privacy Notices
- Physical Restraint and Restrictive Interventions Policy
- SEND and Inclusion Policy
- Attendance Policy
- Suspensions and Permanent Exclusions Policy
- Health and Safety Policy
- Educational Visits Policy
- Medical Needs Policy
- Mental Health and Wellbeing Policy
- Equality, Diversity and Inclusion Policy

Schools must ensure that local safeguarding arrangements remain consistent with this policy and any associated Trust procedures.