



# St Matthew's CE Primary School Child Protection Policy and Procedures

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## Approval

<b>Signed by Chair of Directors</b>	
<b>Date of Approval/Adoption</b>	September 2025
<b>Date of Review</b>	<b>July 2026</b>

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## 1 Policy Statement

At St Matthew's CE Primary School, part of Frays Academy Trust we understand that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone in contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

## 2 Definition

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's mental or physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes;
- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, inside or outside the home, including online (KCSIE 2025).

## 3 Legislative Basis

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Academy trust governance guide](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of

concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

The procedures outlined in this policy apply to our Early Years provision. This policy meets requirements relating to safeguarding and welfare in the [Statutory Framework for the Early Years Foundation Stage](#) (DfE 2025) and [Safeguarding children and protecting professionals in early years settings: online safety considerations](#) (DfE 2019).

We comply with legislation and guidance and the arrangements agreed and published by our schools’ three local safeguarding partners (the three partners are Local Authorities, the Chief Officers of Police and the Clinical Commissioning Groups).

#### 4 Aims

- To raise awareness for all staff in each school as to how to take action when dealing with children who may need protection.
- To ensure that all school procedures conform to Hillingdon local authority guidelines.
- To respect a child’s right to confidentiality, so that only the people who need to know are informed of any details of the protection case.

#### 5 Roles and responsibilities

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers Directors and Governors in the school and is consistent with the procedures of our three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

##### 5.1 Board of Directors

The Board of Directors will:

- Ensure the Trust’s strategic plans reflect safeguarding legislation, regulations, guidance, and the safeguarding expectations of the Trust.
- Ensure there is an annual review of safeguarding policies and procedures and that this is reported to the Board.
- Ensure that clear procedures are in place to deal with allegations against staff and volunteers;
- Promote and create a culture of safe recruitment, adopting procedures that will deter, reject or identify people who could potentially abuse children;
- Appoint a Link Director who is responsible for safeguarding and providing a strategic oversight of safeguarding across Frays. They will work with the Chief Executive Officer (CEO) and Inclusion Strategy Manager to regularly to review whether the Trust has effective systems in place to creating a safe culture and keeping children safe.
- Ensure all schools within the Trust have an annual safeguarding review, overseen by the Inclusion Strategy Manager.

##### 5.2 Frays Inclusion Strategy Manager

The Inclusion Strategy Manager is the Lead Designated Safeguarding Lead (DSL) and will provide strategic leadership, oversight, and coordination of safeguarding and child protection across all

schools. This role ensures the safety and well-being of all students, aligning with statutory requirements and best practices in safeguarding. The Inclusion Strategy Manager will:

- Develop and implement a comprehensive Frays Safeguarding Strategy, ensuring alignment with legal requirements and Trust policies.
- Create, review, and update the Frays Child Protection Policy and Procedures, ensuring they reflect current legislation and best practices.
- Design and deliver high-quality safeguarding training for staff, governors, and volunteers across all schools within the Trust.
- Provide advice and support to DSLs and Headteachers on complex safeguarding cases, ensuring appropriate actions are taken in line with local and national guidelines.
- Conduct the annual Frays Safeguarding Audits and Review in each school, ensuring statutory safeguarding standards are met.
- Prepare and present detailed safeguarding reports to the Board of Directors, highlighting key issues, trends, and actions taken.
- Provide regular coaching, guidance, and support to DSLs, ensuring consistency and high standards in safeguarding practices whilst retaining a focus on DSL wellbeing.

### **5.3 Chief Operating Officer (COO)**

The COO is responsible for ensuring our IT provider(s) have the appropriate level of security protection procedures in place in order to safeguard systems, staff and learners as well as ensuring policies are in place and reviewed annually to keep up with evolving cyber-crime technologies. As technology moves on, the COO is responsible for ensuring the IT provider(s) support the Trust in its IT strategy development, including cyber and network security. The COO will ensure our IT provider(s) submit monthly reports to the school DSLs on any alerts of attempts to access IWF (Internet Watch Foundation) designated sites or other sites/ categories which may result in a potential risk to safeguarding.

### **5.4 Local Governing Body**

The Local Governing Body for each school will ensure that they comply with their duties as laid out in 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. Each individual school's Local Governing Body will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of school process;
- Be familiar with the statutory guidance outlined in Keeping Children Safe in Education (2025);
  - Appoint a named Link Governor for Safeguarding who will participate in the Annual Safeguarding Audit to ensure all policies, procedures and training programmes are being carried out effectively. The Link Governor for Safeguarding is also responsible for supporting the Local Governing Body in holding the school to account for how the school supports looked after (LAC) and previously looked after children, including the use of the pupil premium funding and their level of progress;
  - Ensure that clear procedures are in place to deal with allegations of abuse against staff and volunteers;
  - Promote and create a culture of safe recruitment, adopting procedures that will deter, reject or identify people who could potentially abuse children;
  - Ensure the school's Single Central Record is accurate and up to date and that appropriate background checks completed, in accordance with their roles.
  - Ensure that the school has appropriate filtering and monitoring systems in place, in line with the DfE's Filtering and Monitoring Standards.

## 5.5 Headteacher

The Headteacher will:

- Ensure the Single Central Record is up to date and the safer recruitment practices set out in Keeping Children Safe in Education (KCSIE 2025) are followed in line with each school's Safer Recruitment Policy and Procedures and that at least one member of every recruitment panel has attended safer recruitment training.
- Ensure that Job descriptions and person specifications for all roles make specific reference to child protection and safeguarding.
- Foster a listening culture within each school, where both staff and children feel confident in raising concerns about poor or unsafe practices.
- Make referrals to the Disclosure and Barring Service (DBS) and/or the Teacher Regulation Agency (TRA) as appropriate.
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Liaise with the Local Authority Designated Officer (LADO) where an allegation is made against a member of staff in their setting.
- Ensure the Designated Safeguarding Lead (DSL) within their school has a job description in keeping with the requirements of Keeping Children Safe in Education (2025) and that sufficient time, training and support are allocated to this role, including the appointment of colleagues able to deputise for the Designated Safeguarding Lead (DSL) who have undertaken the same training.
- Ensure risk assessments are completed on all visitors to each school to decide if an enhanced DBS check is necessary.
- Develop the curriculum within their school, so that opportunities to help students stay safe especially when on- line are provided. Children should be aware of the support available to them.
- Quality assure child protection practices including the auditing of safeguarding records and the supervision of the Designated Safeguarding Lead (DSL) and other members of the safeguarding team to ensure that actions and decisions are reviewed appropriately, and that staff have their emotional needs met.
- Implement the Internet Content Filtering Policy and ensure there is a safeguarding response to any breaches of the policy. Ensuring filtering and monitoring provision is formally reviewed, at least annually.
- In keeping with the Prevent Duty, ensure reasonable checks are made on visiting speakers within each school.
- Ensure the relevant staffing ratios are met, where applicable.
- Ensure each child in the Early Years Foundation Stage (EYFS) is assigned a key person.
- Ensure appropriate safeguarding measures are in place for the use of the premises for non-school activities.

## 5.6 Designated Safeguarding Lead (DSL)

Each school of our schools has appointed a senior member of staff with the necessary status and authority to be responsible for matters relating to child protection and welfare. The main responsibilities of the Designated Safeguarding Lead for each school are:

- To be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in each school setting for all matters relating to child protection.
- To be fully conversant with the Local Authority and School Child Protection and Safeguarding Policy and procedures.
- To be available to all staff within their own school community for consultation on child protection issues.
- To co-ordinate the child protection procedures within each school.

- To maintain an on-going training programme for all the employees of their individual schools, including Prevent training
- To monitor the keeping, confidentiality and storage of records in relation to child protection.
- To liaise with Hillingdon's LA Designated Officer (LADO).
- To ensure that appropriate action is taken within each school and that procedures are followed in all Child Protection concerns and actual or suspected cases of child abuse.
- To ensure that assessments of children consider contextual safeguarding and wider environmental factors affecting the child's life that may pose a threat to their safety and/or welfare and are reported as part of the referral process. This would include considering if pupils are at risk of abuse of exploitation outside of the family home.
- To contact the duty social worker within twenty-four hours to seek advice on concerns brought by staff, volunteers or pupils. To also check whether or not the pupil or pupil's family involved is known to Children's Services.
- To monitor the records of pupils within each school who are subject to a Child Protection Plan or Child in Need Plan. To ensure that their records are maintained and updated as notification is received.
- To liaise with other professionals to ensure that children who are subject to a Child Protection Plan or Child in Need Plan are monitored.
- To help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.
- Where appropriate, to take part in the child protection conferences or reviews. When the individual school's DSL cannot attend, he or she will ensure that the Deputy DSL or a key member of staff from the corresponding school attends. Where this is not possible, to provide a written report to the conference from the school. (It is acknowledged that this should occur rarely as the involvement of School staff is vital given the close involvement with the child.)
- To ensure that children have an 'appropriate adult' with them, to support and help them in the case of a police investigation or search
- To inform the child's Social Worker in writing when a child who is subject to a Child Protection Plan moves to another school and to inform the new school of the child's status.
- In consultation with the Trust and Headteacher, to monitor staff development and training needs in their school setting, with regard to child protection issues and to ensure that training provided is current and relevant and shared with all staff members.
- To ensure that the curriculum offers opportunities for raising pupil awareness of child protection issues and developing strategies for ensuring their own protection, for example through the personal, social, health and citizenship education (PSHCE) programme.
- Together with the Headteacher, School Leadership Team and Frays Academy Trust Strategy Group, to annually review the School's Policy on Child Protection and Safeguarding and look at how the duties have been discharged, and to report on this to the Board of Directors and Governors.
- To have a good understanding of the filtering and monitoring systems and processes in place.
- To receive and review any alerts of attempts to access IWF (Internet Watch Foundation) designated sites or other sites/categories which may result in a potential risk to safeguarding.
- To act as a source of support, advice and expertise on matters of safety and safeguarding.

In the absence of the Designated Safeguarding Lead, a Deputy DSL, who must be nominated in advance and will have received full training, must take responsibility for child protection issues within each school.

They will:

- advise and act upon all Child Protection concerns reported to him or her.

- keep each Headteacher informed of all actions
- liaise with Children’s Services and other agencies on behalf of each school.
- carry out any other duties normally conducted by the DSL.

If the DSL is unavailable or is the subject of a complaint, his / her duties will be carried out by the Deputy DSL, who has received appropriate training in safeguarding and inter-agency working.

## 5.7 Staff, Directors, Governors, and Volunteers

All staff, Directors, Governors and volunteers are under a general legal duty to:

- protect children from abuse and promote their welfare.
- be aware of the individual school’s practice and policies on Safeguarding and Child Protection and to follow them.
- know how to access and implement the procedures, independently if necessary.
- in dealing with a child protection issue to remain as objective as possible, never assuming that they know which categories of children are at risk.
- keep an appropriate record of any significant complaint, conversation or event. Information should be recorded verbatim, if possible. They should not prompt, lead or suggest information to the child.
- refer to their school’s DSL (or in his/her absence, the Deputy DSL) immediately.
- undertake appropriate training including induction training and refresher training at regular intervals.

All staff and volunteers that work with children will be expected to read and understand part 1 and annex B of the Department for Education’s statutory safeguarding guidance, [Keeping Children Safe in Education](#), sign to say that they have done this on an annual basis.

## 6 Definitions of Abuse and Neglect

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused or exploited in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children. The following definitions of physical abuse, emotional abuse, sexual abuse and neglect are set out in the DfE guidance Keeping Children Safe in Education (2025).

### 6.1 Physical Abuse

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

### 6.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 involve seeing or hearing the ill-treatment of another. It may involve serious 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 of a child, though it may occur alone.

### **6.3 Sexual Abuse**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section on child-on-child abuse).

### **6.4 Neglect**

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

The safety of the children in our care is paramount. We understand that ALL staff working with our children have a duty of care to take proactive steps to ensure our children are protected from either suffering, or likely to suffer, significant harm as a result of abuse or neglect. We recognise that safeguarding incidents could happen anywhere, and all staff should be alert to possible concerns being raised in school.

## **7 Multi-Agency Working**

### **7.1 Hillingdon**

Hillingdon's multi-agency approach to safeguarding is based upon the principles of 'Working Together to Safeguard Children (2023)' and is published in a document "Hillingdon's Safeguarding Children Partnership", which is available to read here:

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

This Plan sets out the Safeguarding Partnership arrangements for Hillingdon. It has been agreed by the Chief Executive of the Local Authority, the Borough Commander (West Basic Command Unit) and the Managing Director of the NHS Clinical Commissioning Group - who, together, have joint and equal responsibility for developing these safeguarding arrangements. All staff in our schools, with responsibility for safeguarding, e.g. Headteachers, Designated Safeguarding Leads and Senior Leaders understand and follow these arrangements.

## **8 School Referral Procedures**

(See flowchart in Appendix 1 as an illustrative guide)

We ensure that all our staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff understand that they should always act in the best interests of the child. Staff are fully trained on what

do to if a child makes a disclosure about being neglected, abused or exploited and understanding the process of making referrals.

All staff should also be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children (DfE 2025).

**Where a child makes a disclosure to an adult, the following should happen, before the member of staff seeks the Designated Safeguarding Lead (DSL):**

- The member of staff should take care in ensuring they do the following:
  - Remain calm, accessible and receptive
  - Listen carefully
  - Take the child seriously
  - Reassure the child that telling was the correct thing to do
  - Explain, in a child friendly manner, what you will do next
  - Make a careful record of what was said
  - Ensure the child understands that their secret cannot be kept
  
- Staff should also ensure that they do not do the following:
  - React strongly
  - Jump to conclusions; write assumptions
  - Speculate or accuse anyone
  - Ask leading questions
  - Make promises that cannot be kept
  - Stop the child from speaking freely
  - Interrupt the child at any time to get the DSL
  
- When recording information being given by a child, the following needs to be included as much as possible:
  - Record the date, time, people present, including their roles in school
  - Exactly what the child said, verbatim where possible
  - Physical appearance of the child as factually and accurately as possible
  - Written accounts should be signed.

**After the above steps have been taken the member of staff MUST then follow the process below:**

1) The member of staff should alert the Designated Safeguarding Lead (DSL) for the school that they work in immediately. If the DSL is not available or offsite the designated Deputy DSL should be sought. At this point the member of staff should provide a written record of concern, as outlined above.

The DSL will advise on the best course of action to take. This may be:

- Monitoring the situation within school through written notes
- Speaking directly with the child's parents
- Phoning the LADO for advice (Hillingdon - 01895 250975)
- Phoning the Education Welfare Team for advice and information (Hillingdon - 01895 250858)
- Completing an "Early Help Assessment"
- Informing Hillingdon Children and Families Social Care to make a referral (Hillingdon - 01895 556633)
- Informing the Police if there is suspected criminal activity involved

2) The class teacher/DSL should not attempt to 'interview' the child at any stage, but merely to listen and offer reassurance and support. False promises of confidentiality should not be issued in case the matter needs to be referred to Social Services.

3) Before any referral to Social Services, the DSL will contact the MASH (Multi Agency Safeguarding Hub) Team for advice. If the MASH team advise that a referral should be made, then the DSL should inform the parents, this is not necessarily to explain the problem, but merely to inform them of the situation and gain their permission to refer the child. If the parents do not give permission for the child to be referred, then further advice should be sought. Even if permission is not gained from the parents, referrals should still be made. On occasion, based on the specific nature of the referral, the MASH team may request that the DSL does not contact the parents and that Social Care will do this instead.

4) All information regarding the referral - including noting whether parental permission was given, and if not, why not – should be recorded using the Inter-Agency Referral Form and the referring school should keep this securely locked away. Further information needed by Social Services will include:

- the nature of the concern
- background information on the family, if known
- child's full name, dob, address and telephone number, parent/carers names
- child's religion, home language and ethnic origin

5) Social Services should be told whether the parents have given permission for the referral, as compliance with a referral may indicate positive steps from the parent. Parental permission does not need to be sought if it is believed that in doing so, the child would be placed in more danger.

6) Once a child has been identified as a concern, even if it is not referred to Social Services, detailed notes should be kept regarding the child, highlighting any unusual behaviour, bruising, lateness, emotional problems or changes in attitude. These notes should be recorded by staff and kept locked away securely in each individual school, by the DSL.

7) Once a child is subject to an 'Inter-agency Child-protection Plan', staff from the school that they attend will be involved in attending case conferences and contributing to the development of the 'Child Protection Plan' via core group meetings. It is the individual school's DSL's responsibility to prepare reports and information for case conferences and meetings relating to the 'plan'. For further guidance on this, contact Hillingdon Social Services.

8) In some cases, where concerns are clear, but Social Care may deem the child is in no immediate risk of harm, the child may be made part of a 'Child in Need Plan'. The DSL for each school is responsible for preparing reports and information for Child in Need meetings and attending such meetings.

9) If a child alleges to have suffered abuse within any of our school settings or if a member of staff has any safeguarding concerns about adults in any of our schools, this should be brought directly to the corresponding Headteacher, in liaison with the individual school's DSL, who will in turn immediately inform the LA Designated Officer (LADO). If the allegation is made against the Headteacher, it will be directed to the Frays CEO, who would liaise with the LADO directly.

**It should also be noted that any member of staff may raise concerns with Children's Social Care at any time, if they believe there is a risk of immediate serious harm to the child. Anyone can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for reconsideration. If at any point a member of staff feels that a child is being put at risk by the way in which a concern is being handled, they should call the NSPCC Whistleblowing Advice Line (0800 0280285).**

## **9 Training**

The Designated Safeguarding Lead within each school will receive “Working Together to Safeguard Children” training provided by the Local Safeguarding Children’s Board and will subsequently attend a refresher course every two years. In addition to this the DSL will receive further training on Prevent and Keeping Children Safe Online. The Deputy DSL will replicate this training programme.

On induction, all new Trust staff will have Child Protection Training, which will include training on understanding the role of the DSL, Keeping Children Safe in Education 2025, Child Protection Policy, Behaviour Policy, Staff Code of Conduct Policy and the safeguarding response to children who go missing from education.

All Trust staff will receive Child Protection training via in-house INSET on an annual basis to keep them up to date with current procedures and policy. Staff will all be expected to demonstrate that they understand Part One of Keeping Children Safe in Education 2025 and follow up training will be offered if required. Throughout the school year all staff will also receive ongoing safeguarding training each term covering a range of topics but specifically FGM, online safety, child-on-child abuse, sexual violence and harassment and Prevent. A list of all training can be found in each school’s Staff Development records and the Governing Body for each school will monitor records of training.

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated.

All Governors and Senior Leadership Teams across the Trust will also receive appropriate and up-to-date safer recruitment training (where it is relevant to their job role) to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities. Refresher training will occur every two years.

The Designated Safeguarding Lead for each school will attend, wherever possible, the Safeguarding Schools Cluster Meeting, which will meet at least termly and whose members can be gathered for advice at any time. This meeting is a good opportunity to share good practice and to outline concerns.

## **10 Recruitment of Staff**

Safer recruitment procedures will be followed. All Trust staff, Governors and volunteers will be carefully selected and vetted to try to ensure they do not pose a risk to children. All references will be checked and verified. Those staff, Governors and volunteers having contact with children will be checked through the Disclosure and Barring Service at an enhanced level. All Trust staff, Governors and volunteers will receive information and basic training in safe conduct and what to do if they have concerns about a child. This will include information on recognising where there are concerns about a child, where to get advice and what to do if no one seems to have taken their concerns seriously. See Safer Recruitment Policy.

## **11 Curriculum**

We know the crucial role we play in preventative education, and we embrace all opportunities to teach safeguarding topics across the curriculum. Preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment.

Our schools have a clear set of values, upheld and demonstrated throughout all aspects of school life. These are underpinned by our behaviour policy and pastoral support system, as well as by a regularly timetabled Relationships/Sex and Health Education lessons, which is further reinforced throughout the

whole curriculum and tackles key themes such as appropriate behaviour, healthy relationships and consent.

As a Trust we understand the fast pace of changing technology, and whilst embracing the benefits of this we also see how technology can be misused, which in turn may put children at risk. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. This can take many forms including, online grooming, sexting and cyberbullying.

To address this, we ensure our schools:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

## **12 Safeguarding in the early years**

This Child Protection Policy applies fully to our early years settings. All staff receive safeguarding and child protection training that meets the criteria outlined in Annex C of the Statutory Framework for Early Years Foundation Stage, ensuring they are equipped to identify, understand, and respond appropriately to signs of abuse, harm, or neglect. In addition, staff undertake early years-specific safeguarding training to ensure their knowledge and practice are tailored to the developmental needs and vulnerabilities of children aged 0–5. This training is refreshed at least every two years and is supported by ongoing professional development and supervision.

## **13 Supporting pupils**

In the area of child protection there is a pyramid of need for the support of vulnerable pupils. At the top are those pupils on child protection plan and those pupils for whom we have major child protection concerns. Next are children 'Looked After' by the local authority, adopted children and those who are cared for by people other than a parent. Then we have those pupils who take the role as a significant carer for a family member. The DSL for each school is responsible for ensuring that we have an up-to-date list of these groups of pupils.

Next is a larger group of pupils who are vulnerable in some other way. This may be because of family circumstances, health issues or social reasons. Lastly there are the majority of pupils, who do not need on-going extra support but may need some support for a short period of time. This may be, for example, in the case of family illness, crisis or bereavement. Each school's DSL regularly checks our first aid/medical request log for pupils seeking medical assistance, so that we can identify concerns at an early stage. We are committed to providing support for all these groups of pupils appropriate to their needs.

Members of each of our school's Inclusion teams are often aware of pupils who are vulnerable for other reasons. It is their responsibility to ensure that these pupils receive support either from a teacher in school to whom the pupil relates or from an external agency. This situation might be a temporary one or may be on-going. This group may include pupils with SEN and disabilities and those that are lesbian, gay, bisexual and transgender (LGBT).

Pastoral care will be put in place to ensure these pupils have their needs met and inclusion teams will work closely on these plans with parents. All schools will also provide a safe space for pupils who are LGBT to speak out and share their concerns.

### **13.1 Early Help**

All staff understand that some children and families may benefit from early help, which means providing support as soon as a problem emerges at any point in a child's life. We believe that providing early help is more effective in promoting the welfare of children than reacting later. All our staff are trained in understanding the importance of early help and their role in it. In the first instance staff will discuss early help with their school's DSL who may in turn complete an assessment. This will then be discussed with Hillingdon's Early Intervention Team, who may then provide support. This will provide a timely and co-ordinated package of professional help for families.

We ensure that we are alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- has health conditions or a mental health need
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- has a family member in prison or is affected by parental offending
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending.

### **13.2 Pupils on the child protection register or for whom we have child protection concerns**

The number of pupils on a child protection plan varies. There are also other pupils about whom we have child protection concerns who are not on a child protection plan.

Each school within the Trust will support pupils in various ways by:

- following the guidance set out in any Child Protection Plans or Child in Need Plans
- ensuring they know and are comfortable about whom they can approach for help or if they have specific concerns
- monitoring their welfare carefully, including talking to them regularly about their well being
- attending any child protection meetings held on their behalf, including speaking on their behalf at such meetings should they request it
- monitoring their attendance carefully and reporting any unexplained absence to social care
- monitoring their academic grades carefully to try to ensure they are making good progress in school
- enlisting the support of and liaising with other agencies as appropriate

- checking that they have access to all elements of school life, including visits and other activities
- informing relevant staff that they are on a CP plan without breaching confidentiality, so he/she knows to register immediately any concerns however minor with the school's DSL (or a deputy).

### **13.3 Looked After Children (LAC)**

Each school has a trained Designated Lead and Governor responsible for Looked After Children. Each school maintains a list of pupils who are looked after by the Local Authority. In the light of the research that shows that these pupils fare less well at schools than their peers and to narrow this gap, we monitor their progress and wellbeing carefully by:

- working closely with the Virtual School Heads to promote achievement
- being involved in and following the guidance set out in the pupil's Personal Education Plan (PEP)
- arranging for a key member of staff (for example a learning mentor or another teacher to whom the child relates well) to take a particular interest in the pupil's welfare and to talk to them regularly
- targeting pupil premium funding specifically to support children in care.
- attending any liaison or review meetings held on their behalf and keeping in touch with social workers and/or carers
- monitoring their attendance carefully and reporting any unexplained absence to social care and the Educational Welfare service
- monitoring their academic grades carefully to try to ensure they are making good progress
- looking out for difficulties with homework or resources that may be a result of their being in care and giving them help to organise and manage their work and by providing the resources needed
- enlisting the support of and liaising with other agencies as appropriate
- checking that they have access to all elements of school life, including visits and other activities, and by giving these pupils the opportunities to take part in residential trips organised by the school as and when appropriate.

### **13.4 Children who are Absent from Education**

We know that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation. We understand that we must be alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

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

### **13.5 Young Carers**

It is the responsibility of the DSL for each school (or a deputy) to keep a record of those pupils who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement. We offer support to these pupils appropriate to their individual situation in liaison with Hillingdon Young Carers.

### **13.6 Pupils with Special Educational Needs and Disabilities (SEND)**

We understand that children with SEN and Disabilities are a greater risk of being abused. For staff working with children with SEN and disabilities, staff should be particularly vigilant. If children are

behaving in particular ways or they are distressed or their behaviour or demeanour is different from in the past, staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs. We believe that pupils with disabilities have an equal right to protection and as a result we will ensure we work closely with pupils, to understand their needs and break down barriers, which may result in these pupils well-being being put at risk of harm.

### **13.7 Mental Health**

Supporting the mental health of our children is a high priority across all our schools. At Frays, we understand that mental health problems can sometimes be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation (KCSIE 2025). If staff have a mental health concern about a child, then they know to refer it to the DSL immediately. We have a wide range of systems in place to support children and can signpost families to additional mental health services.

### **13.8 Pupils who are Lesbian, gay, bisexual or gender questioning**

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported immediately to the DSL and appropriate pastoral support will be put in place.

When families/carers are making decisions about support for gender questioning pupils, they will be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD). We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## **14 Specific Types of Abuse**

We are aware that our children may be at risk of a number of specific types of abuse. As a result, all of our staff receive regular training on the following:

### **14.1 Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse that involves young people receiving something in exchange for sexual acts. Sexual exploitation can take many forms ranging from seemingly consensual relationships to serious gang and group exploitation and pupils may not realise they are being abused/exploited. As a school staff we should be aware that sexual exploitation can take many forms and that pupils may not exhibit external signs of abuse. Therefore, staff must be vigilant for the less obvious signs, for example suddenly getting lots of new electronic equipment, when before there was none, seeming to have extra money to spend, moving away from established friendship groups etc.

#### **14.2 Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, manipulate, control or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. We also know that children may become trapped as they or their families may be threatened with violence, and they may be coerced or entrapped into debt or into carrying weapons. As a result, they may carry weapons as a form of protection. Our staff are given training on how to spot the signs and indicators of CCE, with an additional focus on County Lines.

#### **14.3 Serious Violent Crime**

We understand that children may be at risk from, or are involved with, serious violent crime. As a Trust we ensure all our staff receive training on this, particularly around understanding the indicators which may signal children are caught up in this. Examples of these indicators are:

- Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

#### **14.4 Serious Youth Violence**

Serious Youth Violence (SYV) includes the threat, and intentional use, of violence towards children under 18 years old. SYV usually occurs in a public place, it may or may not involve the use of weapons and can result in serious physical injury or death. Perpetrators may act alone, or as part of a group, SYV does not always happen in the context of gang activity. The intention of SYV is to cause significant injury, deprivation, psychological harm, or death.

We train our staff to take notice of and listen to children/young people showing signs of being drawn in to anti-social or criminal behaviour. Schools will work closely with Social Care or the Police if necessary to prevent children from being drawn into SYV.

In our Hillingdon schools this includes the DSL referring any concerns about possible exploitation or gangs, even when there is not a named individual, to AXIS, who triangulate and analyse information shared by partners in Hillingdon; to inform concerns around children and young people at risk of/involved in Criminal/Child Exploitation, Serious Youth Violence or Anti-Social Behaviour.

For further information please email: [axis@hillingdon.gov.uk](mailto:axis@hillingdon.gov.uk)

#### **14.5 Female Genital Mutilation (FGM)**

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’ ‘circumcision’ or ‘initiation’.

The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is still legal.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

**Must** immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a pupil must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

DSLs will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

#### **14.6 Forced Marriage and Honour-Based Abuse**

The subject of forced marriage is also highlighted in Safeguarding Children and Safer Recruitment in Education. Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. Forcing a person into a marriage is a crime in England. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Once again, schools can be seen as being in the front line in protecting young people from this type of abuse. A pupil who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear, that the proposed holiday will result in a forced marriage, may only become apparent after several conversations.

These young women may also become victims of what is termed honour-based abuse. This type of abuse is described in 'The Right to Choose' (June 2014) guidance as: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community.'

#### **14.7 Domestic Abuse**

Domestic Abuse, also known as domestic violence or DV, is a pattern of threatening behaviour, coercive behaviour, control, violence or abuse by one person against another in a home or family setting.

It can happen to anyone - regardless of gender, age or culture - and can exist in any relationship - with partners, ex-partners or relatives. Domestic abuse can take many forms and includes, but is not limited to:

- **Physical** – Assault, punching, kicking, hitting, forced imprisonment, biting, strangling, burning, dragging, using weapons, throwing objects
- **Sexual** – Rape, sexual assault, forced prostitution, degradation, using objects, forced to watch or act in pornography
- **Psychological** – Verbal or emotional abuse, threats to kill, blaming, mind games, criticism, accusations, jealousy and obsessive behaviours, manipulation, sleep deprivation

- **Financial** – Preventing a person from getting or keeping a job, taking money, not permitting access to or withholding family income
- **Isolation** – Not being allowed to see others, to see who you want, denied any form of contact with family or friends and any other support networks

Domestic abuse is never acceptable.

Children who witness domestic abuse are being **emotionally abused**. In the majority of reported domestic abuse incidents, children have either been present in the same or a nearby room. Children who witness, intervene or hear incidents are affected in many ways, even after a short time. This can have a long lasting emotional and psychological impact.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the DSL before the child or children arrive at school the following day.

#### **14.8 Child on Child Abuse and Sexual Violence and Harassment between Children**

We recognise that children may become at risk of child-on-child abuse. Staff should recognise that children are capable of abusing other children and we understand that abuse can take place inside or outside of school and online. This can take many forms. The Trust will take such matters extremely seriously. This can include, but is not limited to:

- bullying, which can include prejudice based and discriminatory bullying.
- online abuse: technology is a significant component in many safeguarding and wellbeing issues, and children are may also be at risk of being sexually abused online
- abuse within intimate partner relationships
- sexual assaults/sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos
- 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
- initiation/hazing type violence and rituals
- upskirting

We understand that sexual violence and harassment can occur between children of any age and sex. It can also happen online. Our staff are trained to challenge any form of derogatory and sexualised language or behaviour and are vigilant to sexualised/aggressive touching/grabbing. Behaviours by children should never be passed off as ‘banter’ or ‘part of growing up’. The DfE states ‘child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.’ (KCSIE 2025).

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We also know that children with special educational needs and disabilities are more vulnerable to sexual violence and harassment and staff should be aware that additional barriers can exist when recognising abuse in these children. Children who are LGBT or perceived to be, may also be targeted by other children and harassed or assaulted.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put pupils in the school at risk;
- Is violent;
- Involves pupils being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting).

If a pupil makes an allegation of abuse against another pupil:

- Staff must record the allegation and tell the DSL, but do not investigate it;
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

We will minimise the risk of child-on-child abuse by:

- Instilling a Trust-wide zero tolerance policy towards any sexual violence or harassment
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent;
- Regularly reviewing incidents, looking for trend, patterns of behaviour or areas within the school, where children may be less safe and taking steps to address this;
- Ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

The [Voyeurism \(Offences\) Act 2019](#) states that 'Upskirting' is a criminal offence and may constitute sexual harassment. This 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. All cases where upskirting has been suspected will be dealt with in collaboration with the police.

All abusers will be held accountable for their behaviour and work will be done to ensure that abusers take responsibility for their behaviour and acknowledge that the behaviour is unacceptable.

#### **14.9 Sharing of Nudes or Semi-Nudes (Sexting)**

The term sexting (also known as 'sharing or nudes or semi-nudes or youth produced sexual imagery'), is used to describe the sending and receiving of sexually explicit photos, messages and video clips, by text, email or posting them on social networking sites. Young people may send images and messages to their friends, partners, or even strangers they meet online. Any incidences of sexting, regardless of whether the incident was consensual or non-consensual, will be dealt with immediately, in consultation with the DSL, using the following protocols.

Staff must not:

- View, copy, print, share, store or save the imagery, or ask a pupil to share or download it (if they have already viewed the imagery by accident, they must report this to the DSL);
- Delete the imagery or ask the pupil to delete it;

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers;
- Say or do anything to blame or shame any young people involved.

Staff will explain that they need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Following a report of an incident, the DSL will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s);
- If a referral needs to be made to the police and/or children's social care;
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed);
- What further information is required to decide on the best response;
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown);
- Whether immediate action should be taken to delete or remove images or videos from devices or online services;
- Any relevant facts about the pupils involved which would influence risk assessment;
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult;
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any pupil in the images or videos is under 13;
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

#### **14.10 Pupils at risk of Extremism and Radicalisation**

We understand schools have a vital role to play in protecting pupils from the risks of extremism and radicalisation, a role which is underpinned by the duty in the Counter-Terrorism and Security Act 2015, "to have due regard to the need to prevent people from being drawn into terrorism". We use the following accepted Government definition of [extremism](#), which is:

*Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:*

1. *negate or destroy the fundamental rights and freedoms of others; or*
2. *undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or*

3. *intentionally create a permissive environment for others to achieve the results in (1) or (2).*

We believe that there is no place for extremist views of any kind in our school, whether from internal sources – pupils, staff or governors, or external sources - school community, external agencies or individuals. Our pupils see our schools as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

As a Trust we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for children and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our pupils.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. Education is a powerful weapon against this; equipping young people with the knowledge, skills and critical thinking, to challenge and debate in an informed way. We therefore will provide a broad and balanced curriculum, delivered by skilled professionals, so that our pupils are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalised.

As outlined in the Government’s [Prevent Duty Guidance](#), senior management and governors are expected to assess the risk of pupils being drawn into terrorism, including support for the extremist ideas that are part of terrorist ideology. This is based on an understanding, shared with partners, of the potential risk in our local area.

The DSL for each school will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. If staff are concerned about a pupil, they should not delay in reporting concerns and should follow the procedures outlined in Appendix 1 of this policy.

## **15 Online Safety and use of mobile phone technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, we aim to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### **15.1 The four key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories

- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

We will endeavour to educate pupils about online safety as part of our carefully planned curriculum.

For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

In addition to this we will take further steps to ensure our whole school community knows they have a role to play in ensuring our children do not come to harm online.

This includes:

- training staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- educating parents/carers about online safety via our website and newsletters. We will also share clear procedures with them, so they know how to raise concerns about online safety
- ensuring all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- putting in place robust filtering and monitoring systems to limit children's exposure to risk
- carrying out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

Each of our schools have detailed policy guidance in place to ensure our ability to protect and educate our pupils and staff in their use of technology, this is located in each school's E-Safety policy. We also take advice from the DfE guidance "Teaching Online Safety in Schools" (June 2019).

## 15.2 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT, MS Copilot and Google Gemini.

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

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

### **15.3 IT Acceptable Use**

All authorised users of Frays Academy Trust's network, systems, information and communications equipment, devices (and the data and information they process) must comply with the Child Protection Policy, the Information Security Policy, the IT Acceptable Use Agreement, related policies, and associated guidance. All staff and other users must sign the IT Acceptable Use Agreement and be professional in any communications/actions when using Trust IT systems.

### **15.4 Use of personal mobile phones, including early years settings**

Staff, including in early years, are not permitted to use their personal mobile phone, while children are present/during contact time. Use of personal mobile phones must be restricted to non-contact time, and to areas of the school where pupils are not present (such as the staffroom). This includes volunteers, contractors and anyone else otherwise engaged by the school.

There may be very limited circumstances in which it is appropriate for a member of staff to have use of their phone during contact time for personal reasons. For instance (this list is non-exhaustive):

- For emergency contact by their child, or their child's school
- In the case of acutely ill dependents or family members

The Headteacher will decide on a case-by-basis whether to allow special arrangements.

If special arrangements are not deemed necessary, school staff can use their school office number as a point of emergency contact.

### **15.5 Use of images**

If it is necessary to take photos or recordings as part of a lesson/school trip/activity, this must be done using school equipment.

Staff must not use their personal mobile phones or other devices to take photographs or recordings of pupils, their work, or anything else which could identify a pupil unless they have explicit permission from the Headteacher to do so, and they must immediately transfer images to a school-based system, delete it and not store it on their device. Where these images are published (e.g. on the school website) staff must ensure that it will not be possible to identify pupils by name or other personal information.

Staff must ensure that when they take or publish images of pupils or parents/colleagues, it is with permission.

### **15.6 Data Protection and Information Security**

Detailed guidance on data protection is included in our Data Protection Policy. Staff must also follow guidance in the Information Security Policy.

### **15.7 Safeguarding**

Staff must not give their personal contact details to parents/carers or pupils, including connecting through social media and messaging apps.

Staff must avoid publicising their contact details on any social media platform or website, to avoid unwanted contact by parents/carers or pupils. Further information is included in our IT Acceptable

Use Agreement and Social Media Policy, which all staff and users accessing our IT network and systems must agree to.

### **15.8 Internet Content Filtering**

The Trust has obligations under our Safeguarding duties to ensure only appropriate age-related content is available over the Internet connection against defined user groups. In addition, the Trust takes our 'Prevent Duty' responsibilities seriously to restrict, wherever possible, Trust systems from being used to create, access, transmit or download inappropriate materials under Prevent-related legislation (including the Counter-Terrorism and Security Act 2015).

The Trust monitors Internet activity across our Network and reserves the right to report to the relevant authorities, attempted access to, or dissemination of, such inappropriate material accessed from or via the Internet on our Network.

The filtering of internet content provides an important means of preventing users from accessing material that is illegal or is inappropriate in an educational context. The Trust permits access to a wide range of Internet Content to benefit staff and pupils in their teaching and learning experience. However, there are certain categories of Internet Content which the Trust cannot permit access to either because it is illegal, we have a duty to prevent access or because it poses a risk to the Trust or its systems.

Whilst the Trust allows free access to content on the Internet wherever possible, we utilise third party specialist content filtering software to block certain 'inappropriate' content from all users and to restrict other content between user (profile) groups where its requirement of teaching and learning may be limited. Our Internet Content Filtering Policy sets out roles and responsibilities, approval process for any exemptions and Internet Content categories and their levels of access.

### **16 Single Central Record (SCR)**

All schools and colleges must maintain a Single Central Register (SCR) of pre-appointment checks, as referred to in Keeping Children Safe in Education (2025) and the School Staffing (England) Regulations 2009. It is the responsibility of each school to manage and maintain its own SCR and responsibility for compliance rests with the Headteacher. The Frays Central Team is responsible for completing a Trust SCR for all centrally employed staff as well as the Members and Directors of the Trust. Each school must provide the Frays Central Team with secure access to the school SCR.

Each school's SCR must cover:

- All staff who are employed to work at the school (including all supply staff and teacher trainees on salaried routes);
- Governors;
- Volunteers;
- Contractors.

Further guidance is available to schools in the Single Central Record Procedure and Safer Recruitment and Selection Policy.

### **17 Procedure for dealing with allegations against staff, supply teachers and volunteers**

In the event that there is a concern about a member of staff, supply teacher or volunteer, the corresponding Headteacher or should be alerted immediately. Advice will be sought from the LADO and the member of staff, supply teacher or volunteer concerned will be dealt with accordingly. If the allegation is made against the Headteacher, it will be directed to the Executive Headteacher/CEO, who will liaise with the LADO directly.

For further information please see the Dealing with Allegations of Abuse against Teachers and Other Staff Policy, the Safer Recruitment Policy and the Whistleblowing Policy.

## **18 Transfer of Child Protection Files**

Where children leave one of our schools, the relevant DSL will ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

## **19 Use of school or college premises for non-school activities**

There are times when our schools may hire out the use of their premises/facilities to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities). Headteachers will ensure that appropriate arrangements are in place to keep children safe during such activities.

When services or activities are provided under the direct supervision or management of school staff, Frays arrangements for child protection will apply. However, where services or activities are provided separately by another body the Headteacher of the corresponding school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This will apply regardless of whether or not the children who attend any of these services or activities are children on the school roll. Our expectations for providers will be informed by the Department for Education's non-statutory guidance on [Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings](#). Any provider using our premises for out-of-school settings (OOSS) must be mindful of best practice for creating a safe environment for children in their care, in order to give parents and carers confidence that their child is in a safe activity or learning environment.

Where we receive an allegation relating to an incident that happened when an individual or organisation was using school premises for the purposes of running activities for children, we will follow our safeguarding policies and procedures, which may include informing the LADO.

## **20 Links to other policies**

The following policies are linked to the Child Protection Policy. Please note that all schools in the Frays Academy Trust have their own Child Protection Policies. These policies follow the same high standards and clear procedures for safeguarding but are personalised to include information and procedures specific to each school and are therefore approved at the Local Governing Body level. All other policies are set at Board level and apply to all our schools unless otherwise stated.

- Alternative Provision Policy
- Anti-Bullying Policy
- Attendance Policy
- Behaviour Policy (school)
- Code of Conduct
- Data Protection Policy
- Dealing with allegations or concerns raised against teachers and other staff Policy

- Early Years Policy
- E-Safety Policy (school)
- Information Security Policy
- Internet Content Filtering Policy
- Intimate Care Policy (school)
- IT Acceptable Use Agreement
- Lettings Policy
- Physical Intervention Policy
- Records Management Policy Records Management Schedule
- Safer Recruitment and Selection Policy
- Staff Induction Policy
- Suspension and Permanent Exclusion Policy

## **21 Policy Review**

The Board of Directors will review this Trust policy annually. All schools will review their policy annually, and this will be approved by the relevant Local Governing Body.

## **22 Individual Contacts**

### **22.1 Board of Directors**

- Safeguarding Director: J Foster

### **22.2 All Saints CE Primary School**

- Designated Safeguarding Lead: S Hunter
- Deputy Safeguarding Lead: J Crossan, J Norford, G Sherfield, L Yapp, L Ogston
- Designated teacher for looked after children: S Hunter
- Safeguarding Governor: S Johnston

### **22.3 Beechwood Primary School**

- Designated Safeguarding Lead: R Minter
- Deputy Safeguarding Lead: L Quinell, N Blinco, S Reece, P Stock, J Baker
- Designated teacher for looked after children: R Minter
- Safeguarding Governor: I Warren/G Middleton

### **22.4 Cowley St Laurence CE Primary School**

- Designated Safeguarding Lead: L Coady
- Deputy Safeguarding Lead: D Davies, J Rindsland, L Weller, A Marsh, M Filice
- Designated teacher for looked after children: L Coady
- Safeguarding Governor: R Jones

### **22.5 Keep Hatch Primary School**

- Designated Safeguarding Lead: S Cartwright
- Deputy Safeguarding Lead: C Appleby, Y Caird, N Smith
- Designated teacher for looked after children: S Cartwright
- Safeguarding Governor: A McGuinness

### **22.6 Laurel Lane Primary School**

- Designated Safeguarding Lead: A Walton (maternity leave), E Attwood
- Deputy Safeguarding Lead: N Moffatt, S Keenan, G Rowden
- Designated teacher for looked after children: A Walton (maternity leave), E Attwood
- Safeguarding Governor: S Askew

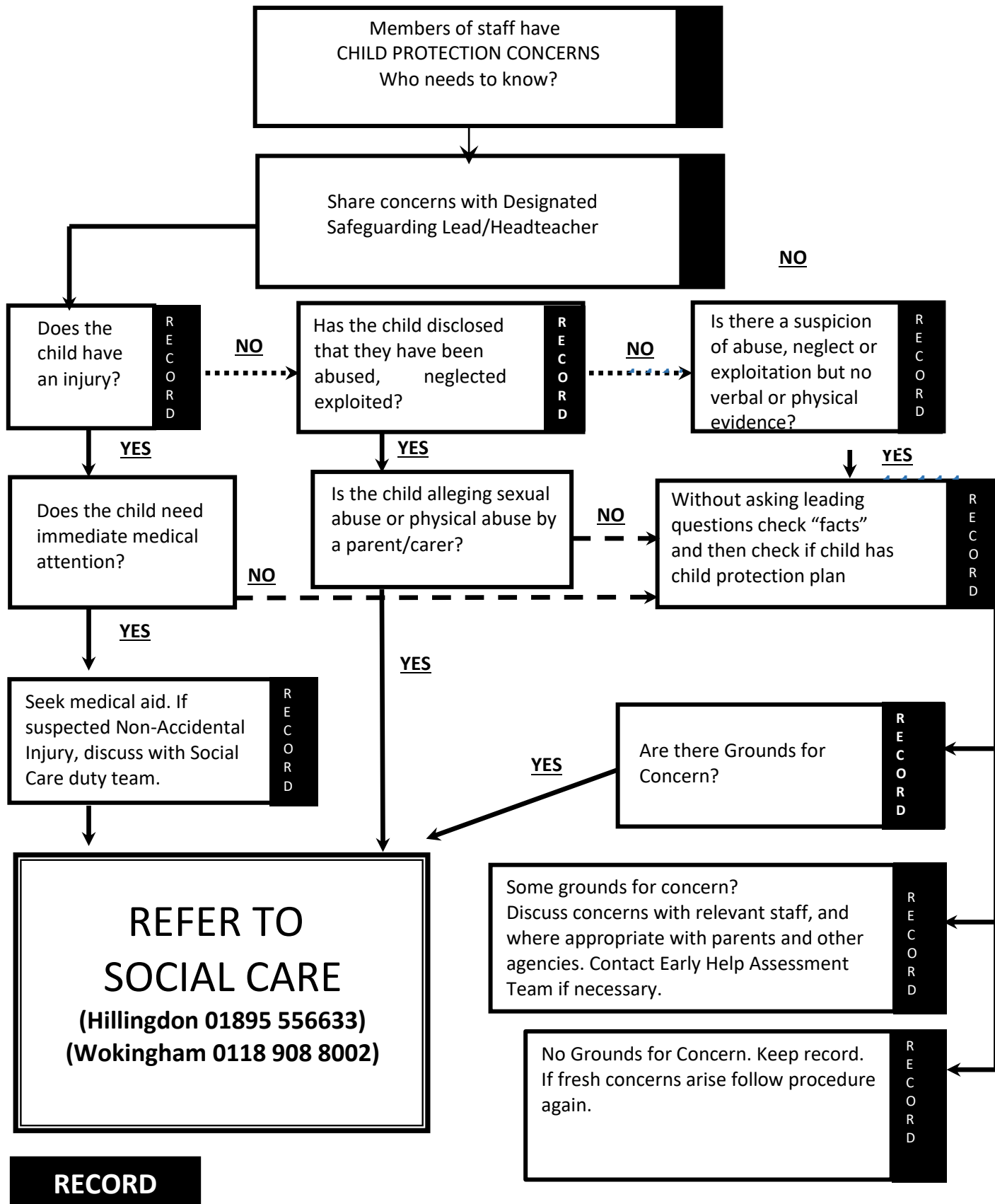
### **22.7 St. Martin's CE Primary School**

- Designated Safeguarding Lead: M Rowden
- Deputy Safeguarding Lead: J Coates, C Baxter, K Higgins, T Dingwall
- Designated teacher for looked after children: M Rowden
- Safeguarding Governor: M Salteras

### **22.8 St. Matthew's CE Primary School**

- Designated Safeguarding Lead: S Malik
- Deputy Safeguarding Lead: L Maher, E Small, L Dewar, C Blake
- Designated teacher for looked after children: M Greenwood
- Safeguarding Governor: R Jones

**Appendix 1 – In-school child protection procedures**



Records should be factual and accurate. They should be dated and signed.  
All Child Protection records to be kept confidential.