HISP Multi Academy Trust

Safeguarding and Child Protection Policy and Procedures

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One Trust, Our Trust
Registered in England & Wales No. 07562918 / VAT Registration GB 129 131827

1. Introduction:

At HISP Multi-Academy Trust, we recognise the significant positive impact of a collaborative approach across our Trust on supporting and protecting children in and beyond our communities. All staff within the Trust are responsible for and committed to providing an environment that safeguards and promotes the welfare, safety, and health of all our children.

The aim of the policy is to:

- Protect children from any maltreatment or harm and prevent any impairment of their health and/or development.
- To ensure each school/setting offers a safe and supportive environment for all children under its care and creates a culture of vigilance throughout the organisation.
- Ensure all staff, trustees, governors, volunteers, and visitors are aware of and clearly understand their statutory safeguarding responsibilities.
- Outline how all staff, trustees, governors, volunteers, and visitors will meet their safeguarding duty and protect children from harm.
- Empower every child, regardless of their background or circumstances, to have the best possible opportunities in life.

HISP implement the following approach to safeguard and promote the welfare of children:

- **Prevention:** HISP schools, Inspiring Future Teachers, Teaching School Hub, Maths Hub, and the One Trust Services will foster a culture where pupils feel safe, valued, and able to build trusted relationships with staff. Children will be encouraged to speak openly and know they will be listened to. All staff and volunteers will receive regular safeguarding and child protection training, including the importance of professional curiosity and recognising that some children may be unable or unwilling to disclose abuse, exploitation, or neglect, or may not recognise it as harmful. Safeguarding, including online safety, will be actively taught through a broad, balanced, and planned curriculum.
- **Protection:** All staff, trustees, governors, volunteers, and visitors engaged in regulated activity with children undergo a thorough safer recruitment process and receive appropriate training and support to respond sensitively and effectively to safeguarding and child protection concerns.
- **Support:** Schools will provide structured systems of support for all pupils and appoint appropriately qualified and experienced staff (DSLs and DDSLs) to provide advice, training, and support around safeguarding concerns.
- **Working with parents/caregivers and external agencies:** High-quality communication with parents and carers to ensure appropriate support and actions are undertaken. Links with external agencies are strong with contextual safeguarding priorities for each school built into the safeguarding curriculum.
- **Commitment:** every member of the HISP community is committed to safeguarding and to creating a proactive culture of vigilance to prevent harm, ensure safe environments to support children's well-being.

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HISP commits to acting in accordance with Keeping Children Safe in Education 2026 (KCSiE) and Working Together to Safeguard Children (2026). This policy does not aim to replicate the guidance in full. Therefore, the policy should be read in conjunction with at least Part One and Annex A of KCSiE (2026).

Whilst the policy primarily focusses on the safeguarding of children, it also references the action to be taken if any member of the Trust community becomes concerned about the safety of welfare of an adult at risk, aged 18 or over.

2. Legislation and Statutory Guidance:

This policy sets out how HISP carries out its statutory responsibility to safeguard and promote the welfare of pupils. This includes:

2.1 Statutory Guidance

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children (2026)
- Relationships Education, Relationships and Sex Education and Health Education guidance
- Multi-agency statutory guidance on female genital mutilation (2020)
- Early Years Foundation Stage (2024)
- Teachers' Standards July (2021)
- 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

2.2 Legislation

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Statutory guidance on FGM, Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015,
- 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
- The Public Sector Equality Duty (PSED)

- 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
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage
- This policy also complies with our funding agreement and articles of association.

HISP also has regard to the following guidance and reviews relating to safeguarding, including:

- Restrictive interventions including use of reasonable force in schools (2026) .
- What to do if you are worried a child is being abused (2015).
- Guidance for safer working practice for those working with children and young people in education settings (2022).
- Information Sharing: Guidance for Safeguarding Services (July 2018).
- Teaching Online Safety in schools (2023).
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024).
- Child Protection in England: National review into the murders of Arthur Labinjo-Hughes and Star Hobson (2022).
- Local Child Safeguarding Practice Review: Child Q (2022).
- Searching, Screening and Confiscation (2022).
- Protecting Children from Radicalisation: The Prevent Duty (2015).
- Filtering and monitoring standards for schools and colleges (2022, updated 2024).
- DfE Mobile Phones in Schools (2026).

2.3 Local guidance

- https://hipsprocedures.org.uk/
- https://pdscp.co.uk/

3. Definitions

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

Children includes everyone under the age of 18.

3.1 Child protection is part of safeguarding and refers to specific actions and measures taken to protect children who are suffering, or are at risk of suffering, significant harm, including abuse or neglect. It involves identifying, responding to, and addressing the immediate safety needs of vulnerable children. This includes harm that occurs inside or outside the home, including online.

3.2 Safeguarding is a broader concept that encompasses all policies, procedures, and practices designed to promote the welfare of children and protect them from harm. It includes preventing harm, ensuring safe environments, and taking proactive steps to support children's well-being.

For the purposes of this policy, the term 'safeguarding' refers to everything all schools do to keep children safe and promote their welfare, including (but not limited to):

- Supporting pupils' health, safety, and well-being, including their mental health;
- Meeting the needs of children with special educational needs and/or disabilities;
- The use of restrictive intervention;
- Meeting the needs of children with medical conditions;
- Providing first aid;
- Educational visits;
- Intimate care and emotional wellbeing;
- Online safety and associated issues;
- Appropriate arrangements to ensure school security, taking into account the local context;
- Keeping children safe from risks, harm, and exploitation; and
- Child protection.

3.3 Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. As stated in KCSiE (2026), all staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Staff should understand that modern slavery includes child criminal exploitation, child sexual exploitation, forced labour, domestic servitude and human trafficking. These forms of abuse often overlap and should always be considered as safeguarding concerns requiring immediate referral to the DSL.

All HISP school follow the definitions of abuse as stated in KCSiE 2026. This includes physical abuse, emotional abuse, sexual abuse and neglect.

3.4 Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos, or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

3.5 Safeguarding partners

The following 3 **safeguarding partners** are identified in KCSiE (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA).
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
- The chief officer of police for a police area in the LA area.

3.6 Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term with which the child involved feels most comfortable.

3.7 Alleged perpetrator(s) and perpetrators(s) are widely used and recognised terms. However, we will think carefully about the terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

3.8 Within this policy:

- **Parents/carers** refers to birth parents and other adults in a parenting role, for example adoptive parents, stepparents, and foster carers.
- **'Staff' or 'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers, and trustees working in or on behalf of the school.

3.9 Keeping Children Safe in Education may be abbreviated to 'KCSiE.'

4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers.

- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality (including perceived sexuality).
- Have English as an additional language (EAL).
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after, previously looked after, or in kinship care.
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated.
- Children who are requiring mental health support.

All HISP schools use the detailed guidance set out in KCSiE (2026) to identify and understand how to support children potentially at greater risk of harm.

5. Roles and Responsibilities

Safeguarding and child protection are everyone's responsibility. This policy applies to all staff, volunteers, and governors across schools, Maths Hubs, Teaching School Hubs, Inspiring Future Teachers, and the Central Team, aligning with the procedures of the three safeguarding partners. It covers extended school and off-site activities.

The Trust and its partners play a vital role in preventative education, fostering a culture of zero tolerance towards sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment. This is supported through:

- Behaviour policies
- Pastoral support systems
- Curriculum planning, including RSHE, which must be overseen by the DSL to ensure content is age-appropriate, evidence-based, and aligned with safeguarding practice, particularly regarding topics such as sexual violence, coercive control, online harm, and harmful sexual behaviour.

All staff are expected to maintain an attitude of respectful professional curiosity, recognising that children may not disclose abuse and that safeguarding concerns often emerge through patterns rather than isolated incidents.

5.1 The Board of Trustees

All trustees and governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. As the chair of trustees or chair of governors may be

required to act as the 'case manager' if an allegation of abuse is made against a Headteacher, they receive training in managing allegations for this purpose. The Board of Trustees:

- determine and keep under review the Trust's safeguarding policy;
- ensure that an effective organisation is created for the management of safeguarding and child protection concerns;
- ensure that the Trust promotes the correct attitude towards safeguarding and child protection with staff, volunteers, and visitors;
- monitor and evaluate the effectiveness of the academies' safeguarding practices and procedures; seeking assurance that safeguarding systems are effective, triangulating information from audits, visits, safeguarding data, staff training, pupil voice and external review.
- nominate a Safeguarding Trustee to monitor the effectiveness of this policy in conjunction with the full board. The Safeguarding Trustee provides a (brief and by exception) written report to each Board meeting to report on risk in this area.

5.2 The Chief Executive Officer (CEO)

The Chief Executive Officer (CEO), on behalf of the Board of Trustees, is accountable for ensuring that HISP fulfils its statutory duties to safeguard and promote the welfare of children across all Trust schools, settings and services. The CEO ensures that effective safeguarding governance, leadership and assurance arrangements are in place across the Trust and reports regularly to the Board of Trustees on safeguarding performance, risk and compliance.

The CEO will:

- Ensure that all schools and services within HISP, including Inspiring Future Teachers, the HISP Teaching School Hubs, the Maths Hub and One Trust Services, have effective safeguarding arrangements, policies and procedures in place that comply with statutory guidance.
- Ensure appropriate executive leadership capacity for safeguarding across the Trust, including the appointment of a Trust Designated Safeguarding Lead and Head of Safeguarding to provide strategic leadership, quality assurance and operational support.
- Receive regular safeguarding assurance from the Trust Designated Safeguarding Lead, including emerging themes, significant incidents, organisational risk and the impact of safeguarding improvement activity.
- Ensure safeguarding remains a strategic priority within Trust improvement planning, organisational development and decision making.
- Regularly review the effectiveness of safeguarding provision across the Trust, including progress against the Trust safeguarding strategy, safeguarding audits, external reviews and quality assurance activity.
- Ensure that this policy is reviewed annually and approved by the Board of Trustees.

- Respond to low-level concerns or allegations involving members of the Executive Team in accordance with the Trust's Low-Level Concerns Policy and procedures for managing allegations against staff.

5.3 Trust Designated Safeguarding Lead (Trust DSL)

The Executive Director of Education is the Trust Designated Safeguarding Lead (Trust DSL) and provides Executive leadership and strategic oversight of safeguarding across HISP. Acting on behalf of the Chief Executive Officer, the Trust DSL ensures that safeguarding is fully embedded within the Trust's educational strategy, school improvement work and organisational culture.

The Trust DSL provides strategic assurance that safeguarding arrangements are effective across all Trust schools and settings and that statutory responsibilities are consistently implemented.

The Trust DSL will:

- Provide Executive leadership and strategic oversight of safeguarding and child protection across the Trust.
- Advise the Chief Executive Officer and Board of Trustees on safeguarding risk, emerging themes, statutory developments and strategic priorities.
- Lead the development, implementation and annual review of the Trust's safeguarding strategy, ensuring safeguarding remains central to Trust improvement and educational excellence.
- Receive assurance from the Head of Safeguarding, Designated Safeguarding Leads and Headteachers regarding safeguarding practice, compliance and quality across all schools and settings.
- Ensure safeguarding is integrated into Trust school improvement activity, leadership development, quality assurance and organisational decision-making.
- Receive notification of serious safeguarding incidents, allegations relating to Headteachers, significant child protection concerns, Child Safeguarding Practice Reviews and other safeguarding matters that present strategic, organisational or reputational risk to the Trust.
- Provide strategic oversight of safeguarding quality assurance, including external reviews, safeguarding audits, thematic reviews and Trust-wide analysis of safeguarding information to identify trends and drive continuous improvement.
- Ensure lessons learned from safeguarding reviews, inspections, audits and serious incidents are implemented consistently across the Trust.
- Work collaboratively with safeguarding partners, local authorities, police, health services and other agencies to strengthen safeguarding practice and promote the welfare of children.
- Line manage the Head of Safeguarding, ensuring sufficient capacity, professional challenge and support to deliver the Trust's safeguarding priorities.
- Provide regular safeguarding assurance reports to the Education and Standards Committee and the Board of Trustees, including safeguarding risks, emerging themes, statutory compliance and the impact of safeguarding improvement activity across the Trust.

- Promote a culture where safeguarding is everyone's responsibility, professional curiosity is expected, and the voice, wishes and lived experience of the child are central to decision-making.

5.4 The Head of Safeguarding

The Head of Safeguarding ensures the strategic safeguarding direction for the Trust. They provide advice, oversight, and assurance to ensure that safeguarding practices are compliant, consistent, and improving across all settings. This includes:

- Providing support to Headteachers and DSLs on safeguarding practice, policy, and statutory requirements.

- Ensuring that the Headteacher in each school is responsible for putting in place and maintaining appropriate safeguarding arrangements, including:
  - Sufficient and suitably trained staffing,
  - Allocation of time and resource for safeguarding roles,
  - Adherence to statutory duties outlined in this policy and KCSiE. Supporting Headteachers in assuring that senior and middle leaders with safeguarding responsibilities are capable and competent, and provided with appropriate professional development.
- Ensuring each school has a nominated safeguarding governor who visits termly and reports on safeguarding assurances.
- Supporting and monitoring the development, implementation, and impact of safeguarding action plans at both Trust and school level.
- Representing the Trust within strategic multi-agency safeguarding partnerships and forums.
- Providing or brokering operational advice and guidance to DSLs on complex cases, thresholds, and contextual safeguarding.
- Chairing the Trust DSL Network and fostering a culture of collaboration, learning, and consistency across schools.
- Being accountable to the Trust DSL who sets the strategic oversight of safeguarding for the Trust at Executive level.

Quality Assurance and Supervision:

- Providing safeguarding supervision to DSLs and other key personnel, supporting reflective practice and professional resilience.
- Conducting regular audits of child protection records and systems to identify themes and inform Trust-wide development priorities.
- Leading and coordinating quality assurance activities in relation to:
  - Safeguarding systems and culture,
  - Alternative provision placements,
  - Elective home education,
  - Children who are absent from education.

5.5 Academy Committees (AC)

It is the overarching responsibility of the ACs to foster a safeguarding culture within their settings, where all stakeholders are actively engaged in promoting a safe environment for children and young people. This involves continuous evaluation, feedback mechanisms, and collaboration with schools to uphold the highest standards of safeguarding practices.The Academy Committee will:

- appoint a nominated Safeguarding Governor to monitor the safeguarding culture and report back to the AC. The Safeguarding Governor will visit the school regularly, following which a written report will be prepared for the AC.
- ensure all those involved in governance attend relevant induction and annual training and development provided. It is the responsibility of all trustees and governors to ensure they have read and understood Part 1 of KCSiE and this policy and have signed a declaration confirming this has been undertaken on appointment and each time the policy and KCSiE are updated.
- contribute to the Trust safeguarding governance arrangements, supporting the Trust Central Team and Trustees to meet their governance responsibilities outlined in KCSiE, including Part 2.
- work to facilitate a whole trust approach to safeguarding, including child on child abuse, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process; seeking assurance that safeguarding systems are effective, triangulating information from audits, visits, safeguarding data, staff training, pupil voice and external review.
- ensure that policies, procedures, and training at Trust level and individual schools and learning partnerships are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner.

5.6 Executive Headteachers/Headteachers/Heads of School/Inspiring Future Teachers/Teaching School Hub/Maths Hub

Each lead holds ultimate operational responsibility for safeguarding and child protection within their setting. They are accountable for the full implementation of this policy and the maintenance of a safe culture for all children, young people, and vulnerable adults through:

- Ensuring that all staff (including agency staff, volunteers, and adult learners):
  - Receive safeguarding information and induction on arrival,
  - Understand and follow the procedures in this policy, particularly for reporting concerns and making referrals.
- Ensuring the DSL and deputy DSLs have:
  - Adequate time, resource, training, and authority to fulfil their responsibilities,
  - Appropriate cover during absences, including during out-of-hours or off-site activity.
- Communication of this policy and safeguarding arrangements to parents, carers, and adult learners, including through the school website.
- Appointing and supporting a DSL and sufficient deputies, ensuring they are trained to the same standard.

- Acting as case manager in the event of an allegation against a staff member or volunteer (as per section 8) and overseeing all referral actions to the DBS/TRA where necessary.
- Ensuring the school works collaboratively with children's social care, police, health, and other partners to:
  - Promote welfare and provide family help where required,
  - Contribute to child protection plans,
  - Support statutory assessments under section 17 and section 47.
- Upholding the Teaching Standards (2012) by safeguarding pupil welfare and maintaining public trust.
- Ensuring the relevant safeguarding ratios are met in early years and primary phases.
- Promoting safe and appropriate use of technology and devices, including mobile phones and cameras.
- Ensuring the proper use of CPOMS/MyConcern or equivalent systems, and that staff follow reporting procedures.
- Ensuring all staff know who the DSL, DDSLs and named safeguarding governor are.
- Ensure RSHE delivery is aligned with this policy, and staff delivering it are supported and trained to manage disclosures and sensitive content.
- Embedding safeguarding into the curriculum, so pupils understand how to stay safe and seek help.
- Appointing a Designated Teacher for Looked After and Previously Looked After Children (and children in kinship care).
- Ensuring dissemination of, and adherence to:
  - The HISP staff code of conduct,
  - The whistleblowing policy and safeguarding allegations procedures.
- Leading safer recruitment in line with KCSiE (Part 3) and maintaining a compliant Single Central Record.
- Maintaining oversight of the safeguarding of all pupils placed in alternative provision, ensuring placements meet the pupils' needs and welfare.

5.7 Designated Safeguarding Leads (DSL)

The DSL is part of the Senior Leadership Team in each school, Inspiring Future Teachers, Maths Hub, Teaching School Hub, or the One Trust Services Team, leading child protection and broader safeguarding, including online safety and oversight of filtering and monitoring systems. DSLs receive dedicated time, funding, training, resources, and support to perform their role effectively.

All HISP DSL will have a full list of responsibilities set out in their job descriptions, however further details can be found in KCSiE Part B.

Note: Neither the Trust DSL nor the HISP Head of Safeguarding, Belonging and Culture is the DSL for any individual schools within the Trust. The Headteacher retains full accountability.

5.8 When the DSL is absent, the Deputy DSL will cover. If they are not available, a member of SLT will cover. Any deputies will be trained to the same standard as the designated safeguarding lead. The DSL and DDSLs will undertake full child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for

example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

5.9 HISP recognises the demands on DSLs and DDSLs and prioritises their wellbeing by not expecting them to monitor emails, phone lines, or CPOMS/MyConcern outside working hours, except during planned trips or activities. This expectation will be communicated to staff, parents, and pupils. To ensure child safety, schools will regularly provide contact details for statutory and non-statutory support services, including police and children's social care, through school communications and websites.

5.10 All staff

Staff play a particularly important role because they are in a position to identify safeguarding concerns. All staff are expected to have read and understand Part 1 and Annex A of KCSiE annually and sign a declaration confirming this. All staff have a responsibility to:

- Provide a safe learning environment for children.
- Be aware of, understand, and follow the Trust's and individual academy's safeguarding and child-on-child abuse policies, recognising their role in prevention and response.
- Complete mandatory safeguarding training to identify signs of abuse, neglect, exploitation, and harm (including FGM), understand disclosure responses, and know the school's safeguarding systems such as CPOMS/My Concern.
- Know the identity and role of the designated safeguarding lead (DSL) and deputies.
- Regularly familiarise themselves with key policies including the Acceptable Use Policy, Code of Conduct, and the HISP Child Protection and Safeguarding Policy.
- Understand the behaviour policy, pastoral support systems, online safety expectations (including filtering and monitoring roles), and safeguarding responses to children missing education.
- Reinforce online safety when communicating with parents/carers, informing them about children's online activities and interactions.
- Understand that children perceived as LGBTQ+ may be particularly vulnerable to targeting or abuse and provide a safe, supportive space for LGBTQ+ pupils to express concerns.
- Understand the family help process and their role in identifying emerging issues, liaising with DSLs, and sharing information with relevant professionals.
- Know how to make referrals to local authority children's social care (MASH/CRS) when concerned about significant harm and understand their potential role in social care assessments.
- Be aware of signs of abuse, neglect, exploitation, domestic and sexual abuse (including coercive control and parental conflict), and specific safeguarding issues such as grooming, CSE, CCE, serious violence, FGM, radicalisation, and emerging online threats.

- Recognise that children may be at risk of harm inside/outside home, at school, and online.
- Know that children and families may experience multiple, complex needs simultaneously.
- Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of Trust or individual school/setting safeguarding policy or practice, they speak to the DSL so that additional training can be arranged.

5.11 Virtual School Heads

Virtual School Heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality and Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold, and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between each school, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. If staff are unsure whether information should be provided, advice should be sought from the Data Protection Officer. All schools adhere to the Data Protection Act (2018) and the General Data Protection Regulation (2018).

HISP reinforces that:

- Timely information sharing is essential to effective safeguarding.
- 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.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if:
    - it is not possible to gain consent;
    - it cannot be reasonably expected that a practitioner gains consent;
    - or to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- See Appendix C for guidance on information sharing regarding sexual violence or harassment.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

6.1 Sharing information with parents:

Each school will ensure the Safeguarding and Child Protection Policy is available publicly on each school's website, it will also be available on the HISP Trust website. Where appropriate, staff will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a serious concern or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If notifying the parents would increase the risk to the child, it will be discussed with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, parents of all the children involved will be contacted.

7. Recognising and Responding to Abuse: How to Take Action

If a member of staff, parent or member of the public is concerned about the safety or welfare of a child, they should report it to the DSL as soon as possible. If the DSL is not available, it should be reported to the deputy safeguarding lead/s immediately. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

7.1 Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

7.2 All staff will be alert to indicators of abuse (including child on child) and will report any of the following to the Designated Safeguarding Lead immediately;

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language, and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;
- any significant changes in a child's presentation;
- any indicators that a child may be experiencing child on child abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse that children have made.

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7.3 More information about our approach to child-on-child abuse (including sexual violence and sexual harassment) can be found in Appendix C.

For more information regarding specific safeguarding issues, please see Part One and Annex A of KCSIE (2026) and Appendix C of this policy.

7.4 Responding to a Disclosure

When responding to a disclosure from a child, staff will:

1. **Listen carefully and calmly**
   - Stay calm, do not show shock or disbelief.
   - Allow the child to speak freely.
   - Avoid interrupting or asking leading questions.
2. **Reassure the child**
   - Acknowledge what they've said.
   - Let them know it was right to tell you.
   - Explain you cannot promise to keep it a secret.
3. **Explain what happens next**
   - Tell them you will need to share this with the DSL.
   - Explain it's to keep them safe.
4. **Record the disclosure**
   - Use the child's own words as far as possible.
   - Record date, time, place, and people present.
   - Stick to facts, avoid assumptions or opinions.
5. **Report immediately**
   - Inform the **DSL or DDSL in person** without delay.
   - Log on CPOMS/MyConcerns the same day.
   - If DSL unavailable and there's immediate risk, refer to children's social care or police directly.
6. **Maintain confidentiality**
   - Only share information on a need-to-know basis.

At all times:
-Take every disclosure seriously.
- Do not make the child feel they're causing a problem.
- Act in accordance with this policy.
-Decisions should be informed by the wishes, feelings and lived experiences of the child wherever possible.

Bear in mind that some children may:

- Not feel ready or know how to tell someone that they are being abused, exploited, or neglected.
- Not recognise their experiences as harmful.

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- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation, and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.5 Reporting and Recording a Concern

All staff and volunteers receive safeguarding procedures guidance during induction and regular updates thereafter. Concerns must be reported promptly, in writing, using CPOMS/My Concern or the school's designated system, and records should be created on the same day, during working hours. Staff must not delay reporting until the next day. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the thresholds guidance published by the local safeguarding partnership. If it is decided to make a referral to children's social care the parent/carer will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

Staff delivering RSHE must be alert to the possibility of disclosures during or following sessions. Any concerns must be reported through the safeguarding procedures immediately. All staff and volunteers will:

- Make a written record of the concern, informing the child that this is being done.
- Pass the information to the DSL or DDSL without delay: in person for immediate or high-priority cases, and in writing for lower-level concerns. All reports to the DSL must be followed up in writing.

The DSL/DDSL will:

- Keep confidential, detailed records of all concerns, actions, and observations. These records will be securely filed and accessible only to authorised personnel (DSL, Head, or Trust Safeguarding Lead).
- Handle communication with parents/carers sensitively, contacting them when there is a concern, suspicion, or disclosure unless doing so may increase risk to the child. In such cases, advice will be sought from children's social care or the Multi-Agency Safeguarding Hub (MASH) before informing parents.
- Make or ensure referrals are made to children's social care when there is reasonable cause to believe a child is suffering, or at risk of suffering, significant harm, following Local Safeguarding Partnership procedures.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the school's own pastoral support processes;
- A Family Help Assessment; or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

7.6 Concerns About Significant Harm or Imminent Danger

If any staff member suspects abuse or imminent danger, they must notify the DSL or DDSL **immediately and in person**. Although the DSL/DDSL usually makes referrals, any staff member can refer directly to children's social care or the police and must inform the DSL as soon as possible. Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Child abuse can also be reported to your local council: https://www.gov.uk/report-child-abuse-to-local-council Each setting will follow local procedures for making a referral.

The school will be guided by MASH/CRS as to the appropriate outcome e.g., complete an Early Help Assessment (EHA) or refer to a relevant specialist agency.

All Child Protection records, including referrals, will be maintained in a confidential file at the school. The protocols as outlined in the Data Protection Policy must be followed.

The local authority will decide about what course of action to take and will inform the referrer of the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. All escalations must be recorded on CPOMS/MyConcern.

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH) or CRS, police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.

Consent will be required before support can be delivered to any individual through the Channel programme. Contact details for the MASH and CRS can be found in Appendix A of this policy.

7.7 Family help and Vulnerable Children

All staff are expected to recognise the signs of abuse, neglect, and exploitation and be alert to children who may benefit from family help — providing timely support when problems first emerge.

If family help is appropriate, the DSL or DDSL will usually lead on liaising with the child, family, and external agencies, arranging inter-agency assessments as needed. Staff may be asked to support these cases and, where appropriate, act as the lead practitioner. All cases must be regularly reviewed, with referrals to children's social care made if concerns persist or escalate.

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Staff will be trained in the family help process, their role in identifying emerging issues, and the importance of information-sharing to support early assessment and intervention. It is vital children receive the right help at the right time to prevent escalation.

All staff are expected to monitor concerns and provide ongoing feedback to the DSL or DDSL. We recognise that any child may benefit from family help, but will be particularly vigilant where specific risk indicators are present, including (but not limited to):

- disabilities or certain health conditions and specific additional needs.
- special educational needs (whether or not they have a statutory Education, Health, and Care plan).
- mental health needs.
- young carers.
- children showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- children frequently missing/going missing from education, home, or care.
- children who have experienced multiple suspensions or are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- children at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- children at risk of being radicalised or exploited.
- children who have a parent or carer in custody or is affected by parental offending.
- children in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues, and domestic abuse.
- children misusing alcohol and other drugs themselves.
- children at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- children who privately fostered child or in kinship care.

The DSL will maintain a list of pupils who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these pupils are monitored closely and supported to achieve the best possible outcomes. Many of these children will be looked after children, previously looked after children, children in kinship care, or have special educational needs or disabilities.

7.8 Trigger Points and Escalation

In the event of serious incidents such as child death, Heads should notify the Trust DSL immediately. The CEO, and Chair of the Trustees will also be informed.

7.9 If you discover that FGM has taken place or a pupil is at risk of FGM

KCSiE 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.’

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in Appendix B of this policy.

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 disclose, 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 under 18** must speak to the DSL and follow 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.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow local safeguarding procedures.

7.10 If you have concerns about extremism

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist-related.

7.11 If you have a concern about mental health

Mental health problems can, in some cases, can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.

All staff should be alert to behavioural or emotional signs that may suggest a child is experiencing poor mental health or developing mental health needs.

The RSHE curriculum is a key preventative and protective tool, equipping pupils with strategies to understand emotions, develop resilience, manage relationships, and seek help when needed. DSLs and mental health leads must work together to ensure RSHE content supports early identification, self-regulation, and signposting to internal or external support.

Where there are concerns that mental health may be linked to safeguarding risks, staff must follow Section 7.5 and report the concern to the DSL immediately.

8. Concerns about a member of staff, governor, trustee, supply teacher, volunteer or contractor

HISP recognises the possibility that adults working in the Trust may harm children, including trustees, governors, volunteers, supply teachers, and agency staff. The guidance in KCSiE (Part Four) should be followed alongside the HISP Low-Levels Concern Policy where it is alleged that anyone working in the Trust, including supply teachers and volunteers has:

- 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 they may not be suitable to work with children.

This includes behaviour or incidents that have occurred in and outside of the Trust or individual school. Staff should share low-level concerns promptly to promote a culture of openness, transparency and early intervention.

If a concern or allegation of abuse arises against any person working or volunteering on the school site (other than the Head), that potentially meets the harm threshold, this must be reported to the Head/Director of the setting immediately and not discussed directly with the person involved. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. The Head/Director of the setting will inform the Trust DSL.

- If the concerns/allegations are about the Headteacher, this must be reported to the Trust DSL who will inform the chair of governors.
- Allegations against the any member of the One Trust Services Team must be reported to the Trust DSL.

- Allegations against the any member of the Executive Team, inclusion the Trust DSL, must be reported to the CEO.
- Allegations against the CEO must be reported to the Chair of Trustees.
- Allegations against the Chair of Governors or Chair of Trustees must be reported to the CEO.
- Alternatively, staff can report the concern through the Trust Whistleblowing Procedure or directly to the Local Authority Designated Officer (LADO).

Allegations against staff relating to a position of trust will be referred to the LADO as soon as possible. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made, and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post because of safeguarding concerns or would have been removed if they had not resigned.

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

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, or contractor) to the Headteacher or Director, report it directly to the local authority designated officer (LADO).

Early Years Providers: Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix F for more detail).

9. Allegations of Abuse Made Against Other Pupils (Child-on-Child Abuse)

At HISP we recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter,” “just having a laugh” or “part of growing up,” as this can lead to a culture of unacceptable behaviours, misogyny and an unsafe environment for pupils. (See Appendix C for more detail).

All child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy. This 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 harmful sexual behaviours, sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of self-generated intimate images and those generated using AI).
- Involves prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination.

9.1 Procedures for dealing with allegations of child-on-child abuse

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

- Staff (including volunteers) 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. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

9.2 Record keeping

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

When a child has made a disclosure, the member of staff/volunteer should;

- Record, as soon as possible after the conversation, verbatim statements and observations, rather than interpretations or assumptions using your setting's local procedures;
- not destroy the original notes in case they are needed by a court (this includes notes taken by the member of staff);
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- use a CPOMS/MyConcern/body map to indicate the position of any injuries if relevant.

9.3 Creating a supportive environment in school and minimising the risk of child-on-child abuse

HISP recognises the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

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- Challenge any form of derogatory or sexualised language or inappropriate behaviour between pupils, including requesting or sending sexual images.
- Being vigilant to issues that could affect any student – for example, sexualised or aggressive touching or grabbing, and initiation or hazing type violence.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils can easily and confidently report abuse using our reporting systems.
- Ensuring staff reassure victims that they are being taken seriously.
- Being alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Supporting children who have witnessed sexual violence. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Considering intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensuring staff are trained to understand:
- How to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to.
    - A friend may make a report.
    - A member of staff may overhear a conversation.
    - A child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity, and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- They have an important role to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s), and friends from either side.

The DSL will take the lead role in any disciplinary action of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent the school from coming to its own conclusion about what happened and imposing a follow up/consequence accordingly. We will consider these matters on a case-by-case basis, considering whether:

- Acting would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

10. Sharing of Nudes and Semi-Nudes ("sexting")

When an incident involving nudes and semi-nudes comes to the attention of any member of staff in an education setting – use the following guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

- the incident should be referred to the DSL (or equivalent) as soon as possible.
- the DSL (or equivalent) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- there should be subsequent interviews with the children or young people involved (if appropriate).
- parents and carers should be informed at an early stage and involved in the process to best support the child or young person, unless there is good reason to believe that involving them would put the child or young person at risk of harm.
- a referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

11. Reporting Systems for Pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

12. Online Safety and the Use of Mobile Technology

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach, and collaboration between key school leads. This includes meeting the DfE's Filtering and Monitoring and Digital and Technology Standards, including cyber security and the DfE guidance on mobile phones in schools. Accordingly, the Trust and individual settings Online Safety Policies and associated Acceptable

Use Policies are written in line with these standards, in addition to KCSiE, 'Teaching Online Safety in Schools' 2023, statutory RSHE guidance 2025 and other relevant statutory and non-statutory guidance.

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.

Online safety should be considered whenever any safeguarding concern is raised, recognising that many forms of abuse now have both online and offline elements.

To address this, all schools and settings must:

- 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.

To meet our aims and address the risks above, individual schools will:

- Educate pupils about online safety as part of our 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're a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of the Code of Conduct ('Photograph, videos, and other creative arts', and 'Internet use and acceptable use of Trust technology').
- Make 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.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (content, contact, conduct, commerce) from the school's IT systems.
- Carry 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.
- Trustees and governors will receive regular assurance regarding the effectiveness of filtering and monitoring systems, including any identified gaps, mitigation and planned improvement.

13. 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 and Google Gemini.

HISP schools, Teaching School Hubs, Maths Hub and Inspiring Future Teachers 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. Staff should not dismiss concerns solely because images, audio or messages may have been generated or manipulated using artificial intelligence. Any reported harm should be assessed on the impact on the child rather than the technology used.

HISP schools, Teaching School Hubs, Maths Hub and Inspiring Future Teachers will treat any use of AI to access harmful content or bully pupils or other adults in line with this policy and other applicable policies. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

14. Notifying parents or Carers

Where appropriate, schools will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a disclosure.

If the DSL, in collaboration with the Head, identifies that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.

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- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

15. Complaints and Concerns about School Safeguarding Policies and Procedures

HISP complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action.

Complaints are managed by the Head, and governors, senior Trust staff and in exceptional circumstances, the CEO. Complaints from staff are dealt with under HISP complaints and grievance procedures. Please also refer to the HISP Whistleblowing policy.

16. Record Keeping

All pupil records are held in line with the records retention schedule. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school (typically until the age of 25 or in line with local authority guidance – however, if records are linked to any ongoing investigations or significant incidents, they may need to be retained for longer periods).

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If staff are in any doubt about whether to record something, they should discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded within **5 days** for an in-year transfer, or within **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

17. Training

All staff members will undertake safeguarding and child protection training at induction, including the code of conduct, whistle-blowing procedures, and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation, or neglect.

Staff involved in the delivery of RSHE must receive regular safeguarding training specific to managing disclosures and teaching sensitive content (e.g. pornography, coercion, gender-based harm).

This training will be regularly updated and will:

- Be integrated, aligned, and considered as part of the Trust-wide, whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners (a) the local authority (b) an integrated care board for an area any part of which falls within the local authority area (c) the chief officer of police for an area any part of which falls within the local authority area.
- Include online safety, including an understanding of the expectations, roles, and responsibilities for staff around filtering and monitoring.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment.
  - Have a clear understanding of the needs of all pupils.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates, including on online safety, at least once a half term (for example, through emails, e-bulletins, and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

18. Policy Monitoring Arrangements

Review of RSHE content and delivery will be part of school based annual safeguarding monitoring and DSL assurance activities. This will quality assured through the annual Trust safeguarding review.

This policy will be reviewed **annually.** At every review, it will be approved by the full Trust board.

19. Links with Other Policies

This policy links to the following setting specific or Trust policies and procedures:

One Trust, Our Trust
Registered in England & Wales No. 07562918 / VAT Registration GB 129 131827

• Behaviour • Disciplinary • HISP Code of Conduct • Complaints • Health and safety • Attendance • Online safety • Mobile phone use	• Equality • Relationships and sex education • First aid • Privacy notices • Whistleblowing • IT acceptable use • One Trust Safer and Inclusive Recruitment Policy • Low-Level concerns

Appendix A: Key Safeguarding Contacts

1.1 School-Specific Safeguarding Leads

School specific contacts, including the Heads and the Designated Safeguarding Leads (DSL) can be found at section 1.7 of this appendix.

1.2 Trust-Wide Safeguarding Leads

The Safeguarding Trustee, Trust DSL and Head of Safeguarding for HISP can be contacted using the details below:

Safeguarding Trustee

_____(TBC)_____ email: info@hispmat.org_Phone number: 02382 541374

Trust DSL

Jo McKeown email: j.mckeown@hispmat.org Phone number: 02382 541374

Head of Safeguarding, Culture and Belonging

Jess Paul Email: j.paul@hispmat.org Phone number: 02382 541374

1.3 Local Authority Integrated Multi-Agency Contacts

When a professional working in Hampshire, Isle of Wight, Portsmouth, Southampton, or Bournemouth, Christchurch and Poole assesses that a child/family requires additional support, they need to complete an inter-agency referral or contact form as per local processes and share this with the relevant Multi-Agency Safeguarding Hub (MASH) or Children's Resource Centre (CRS).

If a professional believes that a child may be at risk of significant harm, they should both telephone the MASH/CRS (or out of hours children's services) and fill in an interagency form.

Bournemouth, Christchurch, and Poole (BCP)

- MASH: Inter-Agency Referral Form (Out of hours: 01202 738256)
- LADO@bcpcouncil.gov.uk 01202 817 600

Hampshire

- MASH: 0300 555 1384 (Out of hours: 0300 555 1373) Professionals should complete the Inter-Agency Referral Form (IARF)
- LADO service initial enquiry form- (office.com)/ LADO notification form.

Isle of Wight

- MASH: Concern needs immediate action, call 01983 823435 (Out of hours: 0300 555 1373). Where immediate action is not needed professionals can use the referral form **Form Page - Inter-agency referral to Children's Services - Isle of Wight Council Form System**
- LADO service on (01983) 823435 or email LADO@IOW.gov.uk a referral form will be sent.

Southampton

- CRS: 02380 83 2300 (Out of hours: 02380 23 3344)
- LADO: lado-notification-form-2024.doc Phone: 023 8091 5535/ 07500 952 037 E-mail: lado@southampton.gov.uk

1.4 Whistleblowing Officer

The Trust Whistleblowing Policy states that concerns should usually be reported to the Headteacher, Head of School, or Head of Organisational Unit.

If the concern involves one of these roles, report it to an Executive Headteacher or the Executive Director of Education.

- If it involves an **Executive Headteacher**, inform the **Executive Director of Education**.
- If it concerns the **Executive Director of Education**, report to the **CEO**.
- If it concerns the **CEO**, report to the **Chair of the Trust**.

1.5 Other contacts

- Professional Online Safety Helpline 0344 381 4772 or helpline@saferinternet.org.uk
- NSPCC 0808 800 5000 or help@nspcc.org.uk – 24-hour service.
- Childline 0800 1111 https://www.childline.org.uk/
- Police 111 or 999 in emergency

1.6 Safeguarding Adults

An adult at risk is defined as any person who is 18 and over, who needs care or support, is experiencing, or is at risk of, abuse or neglect, and as a result of their needs is unable to protect themselves against the abuse or neglect. Contact details for the Safeguarding Adults Teams can be found below:

- BCP: 01202 123654 asc.contactcentre@bcpcouncil.gov.uk
- Hampshire: 0300 555 1386 (out of hours 0300 555 1373)
- Isle of Wight: 01983 823340 safeguardingconcerns@iow.gov.uk
- Southampton: 023 8083 3003 (out of hours 02380233344)

1.7 HISP School Safeguarding Contacts

School	Contact Number	Head	DSL
Portswood	023 8055 5885	Anthony Head (Headteacher) tony.head@portswoodpri.org.uk	Anna Adams anna.adams@portswoodpri.org.uk
Tanners Brook	023 8077 1659	Ingrid Dowse (Co-Headteacher) ingrid.dowse@tannersbrookpri.org.uk Sarah Mack (Co-Headteacher) Sarah.mack@tannersbrookpri.org.uk	Lisa Welch lisa.welch@tannersbrookpri.org.uk
Carisbrooke College	01983 524651	Natalie Sheppard (Headteacher) natalie.sheppard@carisbrooke.iow.sch.uk	Natalie Bracegirdle Natalie.bracegirdle@carisbrooke.iow.sch.uk
Crofton School	01329 664251	Mark Palmer(Headteacher) MPalmer@croftonschool.co.uk	Clare Farrand Cfarrand@croftonschool.co.uk
Highcliffe School	01425 273381	Patrick Earnshaw (Headteacher) pearnshaw@highcliffeschool.com	Sarah Giller sgiller@highcliffeschool.com
Medina College	01983 526523	Jess Paul Jess.paul@medina.iow.sch.uk	Katie Sandiford Katie.sandiford@medina.iow.sch.uk
Danebury School	01264 810555	Nicky Goodridge (Headteacher) goodridgen@danebury.hispmat.org	Gail Martin marting@danebury.hispmat.org
Thornden School	023 8026 9722	Caroline Lowing (Headteacher) c.lowing@thornden.hants.sch.uk	Adam Thomas a.thomas@thornden.hants.sch.uk

1.8 HISP Safeguarding Contacts

Partner	Contact Number	Lead & DSL
Inspiring Future Teachers	023 8024 6950	Helen Shaw (Director of Inspiring Future Teachers) h.shaw@hispmat.org
HISP Teaching School Hub	023 82357 517	David Higginbottom (Deputy Director TSH) d.higginbottom@hispmat.org

Appendix B: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents; sexually motivated incidents and financially motivated incidents.

a. Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share a nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person.
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images.
- Moved from a public to a private/E2EE platform.
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes.
- Offered something of value such as money or gaming credits.
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images.

b. Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them.
- Use images that have been stolen from the child or young person taken through hacking their account.
- Use digitally manipulated images, including AI-generated images, of the child or young person.

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person.
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first.
- Moved from a public to a private/E2EE platform.
- Pressured into taking nudes or semi-nudes.
- Told they have been hacked and they have access to their images, personal information, and contacts.
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

Children who are absent from education

Attendance information forms an important part of safeguarding. Persistent absence, severe absence, repeated lateness, part-time timetables and unexplained absence should always be considered alongside wider safeguarding information and may indicate abuse, neglect or exploitation. 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, exploitation, and neglect, including sexual exploitation, and to help prevent the risks of going missing in the 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 admissions register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns, which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn. 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 key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is referred to as Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

Honour-based abuse (including FGM and forced marriage)

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL 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.

This policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

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.

Forced marriage

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is at risk of forced marriage, they should speak to the pupil in a secure and private setting, ensuring the pupil feels safe and supported. The concern must then be reported immediately to the Designated Safeguarding Lead (DSL).

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.
- Ensure that a Prevent risk assessment has been completed Prevent duty: risk assessment templates - GOV.UK (www.gov.uk)

Radicalisation – Extremism - Terrorism

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

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

- Negate or destroy the fundamental rights and freedoms of others; or

- Undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.

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 of terrorism 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

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

- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.10 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and we will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

Each school will ensure that they have clearly communicated procedures and processes that will be followed If a child is not collected at the end of the session/day.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Each school will ensure that they have clearly communicated procedures and processes that will be followed If a child goes missing.

More details regarding the following specific safeguarding issues can be found in KCSiE (2026) Annex A:

- Child abduction and community safety incidents.
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE).
- County lines.
- Children and the court system.
- Children missing from education.
- Children with family members in prison.
- Cybercrime.
- Domestic abuse.
- Homelessness.
- Modern Slavery and the National Referral Mechanism.
- Preventing radicalization.
- The Prevent duty.
- Channel.
- Serious Violence.
- Honour based abuse (including Female Genital Mutilation and Forced Marriage).
- FGM.
- FGM mandatory reporting duty for teachers.
- Forced marriage.

Appendix C: Child-on-Child Abuse and Harmful Sexual Behaviour Guidance

Child-on-child abuse occurs when children abuse other children. This can happen both inside and outside of school, face-to-face or online, and may occur simultaneously across both. We have a zero-tolerance approach to all forms of child-on-child abuse, including sexual violence and harassment, recognising that absence of reports does not indicate absence of incidents.

Forms of Child-on-Child Abuse

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

- Bullying (including prejudice-based, discriminatory, and cyber-bullying).
- Abuse in intimate relationships between children.
- Physical abuse (hitting, kicking, hair-pulling, etc.) — potentially with online elements.
- Sexual violence (rape, assault by penetration, sexual assault — face-to-face or online).
- Sexual harassment (sexual comments, jokes, or online harassment).
- Causing someone to engage in sexual activity without consent.
- Non-consensual and consensual sharing of nude/semi-nude images ("sexting").
- Upskirting.
- Initiation/hazing-type violence and rituals.
- Online abuse (abusive messages, non-consensual image sharing, harassment).
- Prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination.

Staff Responsibilities

If a child discloses, or staff suspect, child-on-child abuse:

- Listen calmly, reassure, avoid judgment.
- Avoid leading questions.
- Record the disclosure factually in the child's words.
- Inform the DSL/DDSL immediately.
- Do not promise confidentiality.

Staff must challenge inappropriate behaviours and make clear these are unacceptable and not a 'normal part of growing up.'

Victims of Sexual Violence and Harassment

Victims will:

- Be taken seriously, supported, and protected.
- Never be made to feel they're causing a problem by reporting abuse.
- Be reassured that the law exists to protect them.

Staff should be particularly alert to the increased vulnerability of:

- Girls.
- Children with SEND.
- LGBTQ+ children and children perceived to be LBGTQ+.

DSL Response to Harmful Sexual Behaviour

When responding, the DSL will:

- Safeguard all children involved.
- Triage and record incidents using the Hackett Continuum.
- Balance the victim's wishes against safeguarding duties.
- Inform parents/carers appropriately (unless this increases risk).
- Refer to police or social care in accordance with local authority expectations.
- Make and regularly review a risk and needs assessment.
- Offer appropriate specialist support to all involved.
- Record decisions, rationale, and actions on CPOMS/MyConcerns.

Police Involvement

Where police are involved:

- Agree information sharing protocols with police.
- Manage ongoing risk while investigations proceed.
- Review risk assessments following outcomes.
- Take disciplinary action where appropriate, without prejudicing investigations.

Ongoing Support

The DSL will:

- Support the victim to stay in school if they wish.
- Offer internal and external specialist support.
- Avoid isolating the victim unnecessarily.
- Work with families to support alternative provision if preferred.

For the child displaying harmful behaviour:

- Identify unmet needs and trauma.
- Manage risks to other children.
- Support access to education.
- Put safeguarding management plans in place.

Monitoring and Review

The DSL will:

- Regularly review incidents to check processes have been followed.
- Monitor for patterns of concerning behaviour.
- Review policies and provide additional training if needed.

Appendix D Elective Home Education (EHE)

Whilst HISP recognises that many home educated children have an overwhelmingly positive learning experience, this is not the case for all. This can mean some children are less visible to services that are there to keep them safe and supported in line with their needs.

All staff will encourage parents to send their children to school to embrace the benefits of being a part of the HISP community, particularly those who are vulnerable. Under no circumstances will any school attempt to pressure or encourage a parent to home educate.

Where an application for EHE is made, the school will seek to meet with parents to determine whether the decision to home educate is in the best interests of the child. A summary of this meeting will be recorded on CPOMS/MyConcern.

The school will also look to engage the Local Authority and other relevant agencies at the earliest opportunity to ensure that parents and carers have considered what is in the best interests of their child. This is particularly important where a child has SEND and/or a social worker and/or is otherwise vulnerable. Where a child has an EHCP, the local authority will need to review the plan, working closely with parents and carers.

If at any stage safeguarding concerns are identified, these will be referred to the Multi-Agency Safeguarding Hub without delay, in line with the procedures outlined above.

In any event, the Local Authority and the Trust will be informed of a parental request for EHE.

If a parent wants to admit their child to a school, the normal processes for in-year admissions applications will be followed.

The Headteacher will sign off on all elective home education.

Appendix E: Single Central Record

Each school will maintain a Single Central Record (SCR) of all school employees, agency staff, volunteers (including governors), contractors, and any others involved in regulated activity (including Alternative Provision).

The SCR will be overseen and directly managed by the Head with the support of the DSL. It is the responsibility of the HR to maintain the information on the SCR.

Audits will be conducted half-termly, by the Designated Safeguarding Lead and Head alternately. The Safeguarding Link Governor must undertake a formal SCR check alongside the DSL and/or Headteacher at least termly and record findings in governor monitoring records.

The details of an individual should be removed from the SCR once they no longer work for the school and/or Trust.

The SCR will be maintained centrally for all Trust-wide members of staff, Directors, and Trustees. This will be shared with all HISP schools as and when it is updated.

Statutory requirements as outlined in KCSiE 2026 will be met:

- the SCR covers all staff, even if they only work for one day – for academies and free schools, this includes the members and trustees of the academy trust
- for agency and third-party staff, the SCR records:
    - whether the school has received written confirmation that the employment business supplying the member of staff has carried out the relevant checks and obtained the appropriate certificates.
    - the date the school this confirmation was provided.
    - whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

For all remaining staff (including teacher trainees on salaried routes), the SCR must record whether the following checks have been carried out (or certificates obtained). These include:

- an identity check.
- a standalone children's barred list check.
- an enhanced DBS check (with children's barred list check) requested/certificate provided.
- a prohibition from teaching check.
- further checks on people who have lived or worked outside the UK.
- a check of professional qualifications, where required.
- a check to establish the person's right to work in the UK.
- for academies and free schools, if the section 128 checks have been carried out for those in management positions.

The SCR indicates the date when each check listed above was completed (or certificate obtained).

Process for Escalating Safeguarding Concerns

If during a monitoring visit, review of documentation, or SCR check the Trust DSL or Link Governor identifies a safeguarding concern, the following process must be followed:

Step	Action	Responsible	Timescale
1	Raise the concern immediately with the Headteacher and DSL.	Trust DSL/Link Governor	Same day
2	Record the concern and agreed actions in the Governor Monitoring Visit Record.	Trust DSL/Link Governor	Same day
3	If unresolved or of a serious nature (e.g. SCR non-compliance or risk to child safety), escalate to the Trust DSL and Chair of Governors.	Trust DSL/Link Governor	Within 24 hours
4	The Headteacher must respond in writing to the Link Governor and Chair of Governors/Trust DSL within **48 hours**, detailing the action taken or planned.	Headteacher	Within 48 hours
5	The issue and response should be formally logged and presented at the next full AC/Trust Board meeting.	Clerk to Governors	At next scheduled meeting
6	If unresolved or if the concern relates to the Headteacher, escalate via the Trust DSL.	Trust DSL.	Immediately, within same working day

Each Executive Headteacher, Headteacher, Head of School, Inspiring Future Teachers lead, and Teaching School Hub lead retains accountability for their Single Central Record (SCR). The Trust is responsible for quality assuring this.

Appendix F Additional Information

Early Years Settings Within Schools

As an early year's provider delivering the Early Years Foundation Stage (EYFS), all HISP primary schools aim to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

All HISP Primary schools will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing;

- a safe secure learning environment;
- a member of staff who holds a current, paediatric first aid certificate is always available on the premises, and accompanies children on school trips;
- a designated key worker who liaises with parents and carers;
- routine monitoring of health and safety practices, to promote children's safety and welfare;
- appropriate staffing, ratios, and qualifications comply with statutory guidance and can meet the needs of all children;
- an environment where children can be seen and heard at all times;
- a member of staff responsible for leading on safeguarding within the early years; and
- training and development for all staff so they can take appropriate action where there are safeguarding or child protection concerns.

Safeguarding Adults at Risk

HISP recognises its legal and moral responsibility to safeguard adults at risk of abuse or neglect in their care; we take proactive steps to create safe and supportive environments for vulnerable adults.

Adults at risk include any adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect, and;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

The Care Act (2014) identifies the following categories of adult abuse and harm:

- Physical
- Sexual
- Emotional/Psychological
- Neglect and acts of omission
- Financial or material abuse
- Discrimination
- Organisations/institutional abuse

- Domestic abuse (including coercive control)
- Modern slavery

When supporting adults at risk, the Trust will act in line with the following principles as set out in the Care Act (2014):

- Empowerment – Empowering adults at risk to make their own choices and decisions, have control over their lives, and participate actively in decisions that affect them.
- Prevention – It is better to take action before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented.
- Protection – Support and representation for those in greatest need.
- Partnership – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- Accountability – Accountability and transparency in delivering safeguarding.

If any member of the Trust community has a concern about the safety or welfare of an adult at risk, this should be reported to a DSL or DDSL immediately. Where the subject of the concern is a pupil (e.g., in Sixth Form), or has links to a current pupil, the concern should be logged on CPOMS/MyConcern. In all other cases, staff should speak to the DSL/DDSL for advice.

When responding to concerns about adults at risk, DSLs/DDSLs will be guided by the principles above and will seek advice from Adult Social Care.

Strip Searches and Appropriate Adults

The following information is taken from the DfE guidance on Searching, Screening and Confiscation (2022) and the Police and Criminal Evidence Act.

a. Strip Searches

A strip search is a search involving the removal of more than outer clothing. Strip searches on school premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C.

While the decision to undertake the strip search itself and its conduct are police matters, staff retain a duty of care to the pupils involved and should advocate for pupil wellbeing at all times. **Staff are not permitted to conduct strip searches on pupils**.

Before calling police into school, staff should assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing and the risk of not recovering the suspected item.

Staff should consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other appropriate, less invasive approaches have been exhausted. Once the police are on school premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school is to advocate for the safety and wellbeing of the pupil(s) involved.

Unless there is an immediate risk of harm and where reasonably possible, staff should inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents should always be informed by a staff member once a strip search has taken place. Schools should keep records of strip searches that have been conducted on school premises and monitor them for any trends that emerge.

Except in cases of urgency where there is risk of serious harm to the pupil or others, whenever a strip search involves exposure of intimate body parts there must be at least two people present other than the pupil, one of which must be the appropriate adult (see below). If the pupil's parent would like to be the appropriate adult, the school should facilitate this where possible. Police officers carrying out the search must be of the same sex as the pupil being searched. An appropriate adult not of the same sex as the pupil being searched may be present if specifically requested by the pupil. Otherwise, no-one of a different sex to the pupil being searched is permitted to be present, and the search must not be carried out in a location where the pupil could be seen by anyone else.

Except in urgent cases as above, a search of a pupil may take place without an appropriate adult only if the pupil explicitly states in the presence of an appropriate adult that they do not want an appropriate adult to be present during the search, and the appropriate adult agrees. A record should be made of the pupil's decision and signed by the appropriate adult. The presence of more than two people, other than an appropriate adult, shall be permitted only in the most exceptional circumstances.

Strip searching can be highly distressing for the pupil involved, as well as for staff and other pupils affected, especially if undertaken on school premises. PACE Code C states that a strip search may take place only if it is considered necessary to remove an item related to a criminal offence, and the officer reasonably considers the pupil might have concealed such an item. Strip searches should not be routinely carried out if there is no reason to consider that such items are concealed.

Pupils will be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a police matter but should always be accompanied by a safeguarding process handled by the school which gives attention to the pupil's wellbeing and involves the DSL/DDSL. Safeguarding should also be at the centre of support following a strip search in which the item is not found, both in the sense of supporting the pupil to deal with the experience of being searched, and regarding wider issues that may have informed the decision to conduct a strip search in the first place. In both cases, pupils should feel that they have an opportunity to express their views regarding the strip search and the events surrounding it. School staff should give particular consideration to any pupils who have been strip searched more than once and/or groups of pupils who are more likely to be subjected to strip searching with unusual frequency and consider preventative approaches.

b. **Appropriate Adults**

The Police and Criminal Evidence Act (1984) PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE also states that if at any time an officer has any reason to suspect that a

person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The DSL (or DDSL) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS/MyConcern. If having been informed of the vulnerabilities, the DSL or DDSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

The 'appropriate adult' means, in the case of a child:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
    a) a police officer;
    b) employed by the police;
    c) under the direction or control of the chief officer of a police force; or
    d) a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.
https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

Appendix G: Briefing Sheet for Temporary and Supply Staff

While working in our school, you have a duty of care towards the children and young people here. This means that at all times you should act in a way that is consistent with their safety and welfare. In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL).

This is not an exhaustive list, but you may have become concerned as a result of:

- Observing a physical injury, which you think may have been non-accidental.
- Observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for.
- Observing child behaviour that leads you to be concerned about a child or young person.
- A child or young person telling you that they have been subjected to some form of abuse
- Observing adult behaviour that leads you to be concerned about their suitability to work with children or young people.

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL as soon as possible – the same day of the disclosure. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish.
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect.
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it and give your record to the DSL who should follow due process, including contacting Children's Social Care if appropriate.

Remember, if you have a concern, report it.

Appendix H: Inspiring Future Teachers (IFT) Safeguarding and Child Protection Policy

As part of HISP, Inspiring Future Teachers adopt the HISP Trust Safeguarding and Child Protection policy. Further details regarding specific procedures related to IFT are as follows:

1. **Aims and Values**

IFT is committed to the safeguarding and welfare of children. Staff, trainees, and partners (including trainers, mentors, and professional tutors) are expected to share this commitment. All children have a fundamental right to be protected from harm and to have access to an educational environment in which they feel safe and secure. Safeguarding concerns are expected to be handled sensitively and professionally, and always with the health and safety and the needs of the child as the focus. The aim of this IFT policy is to ensure that staff, trainees, and partners are aware of the responsibilities towards safeguarding and can act with clear direction and with knowledge of good practice and procedures.

2. **Core principles**

The core principles of this policy are:

- the welfare of children is paramount
- to provide a learning environment for children which is safe and secure
- to teach children how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm
- children and young people have a right to be treated with respect and dignity, as do the adults who work with them
- it is the responsibility of all adults to safeguard and promote the welfare of children and young people
- to recognise that all children may be vulnerable to abuse, but be aware that some children have increased vulnerabilities due to special educational needs or disabilities
- to maintain a robust recording system for any safeguarding or child protection information
- all children and young people must have the opportunity to express their views about decisions taken about their lives
- to create and embed a culture of openness, trust and transparency in which IFT's values and expected behaviours, set out in the code of conduct are lived, monitored and reinforced constantly by all partners.

3. **Recruitment of Trainees**

Before commencing the IFT training programme, IFT will undertake DBS Enhanced Disclosures and Prohibition for Teaching for all trainees to ensure compliance with DfE requirements. For salaried trainees, these checks are completed by the employing school.

A record of all checks on trainees will be held on the Single Central Record. A satisfactory check is defined as having no criminal convictions (including cautions, reprimands, and final warnings) that might impact on undertaking the role of a trainee teacher. Overseas police checks will be carried out for those who have lived outside the UK for six months or more within the last five years, in line with Keeping Children Safe in Education (2025) and the ITT Criteria and Supporting Guidance (Initial teacher training (ITT): criteria and supporting advice, academic year 2024-25 (publishing.service.gov.uk)

All registered trainees must report any subsequent criminal convictions to the ITT Hub Lead. (who will inform the IFT policy and compliance lead). Failure to do so will result in disciplinary action being taken. It is the responsibility of the trainee to complete the DBS application correctly. Where a DBS certificate shows a conviction, caution, reprimand or final warning, the ITT Hub Lead will liaise with the placement school Headteacher who will refer it to the Director of IFT. The Director of IFT will liaise with HISP's Accounting Officer who will have the final decision on satisfactory DBS checks.

If evidence comes to light where convictions or safeguarding concerns have been withheld, the IFT Hub Lead, in conjunction with the IFT Director and the IFT Policy and Compliance Lead, will investigate the evidence and make a decision as to the trainee's placement on the Programme. This may lead to their place being terminated and the trainee withdrawn on the basis of the trainee having withheld information related to criminal convictions.

If the application discloses a criminal conviction, then this is dealt with at the interview stage. The IFT Central Board will decide with the Director of IFT, the Director of School Improvement and Safeguarding, the Executive Director of People, and the Accounting Officer if this is a barrier to the programme.

If the DBS shows convictions, offences, cautions or warnings then these will be discussed with the HISP Executive Director of People to establish an appropriate understanding of what poses a barrier for commencing the programme.

Candidates who are unsuited to working with children may not have any previous convictions, and providers should be vigilant during the selection process. Providers or employing schools have a duty to ensure that trainees are properly managed and supervised and that, if they have concerns, information is referred to the police and the DBS.

Candidates who have lived or worked outside the UK must undergo the same checks as all other staff in schools and colleges. In addition, further checks should be carried out so that events that occurred outside the UK can be considered. The Home Office has published guidance on criminal record checks for overseas applicants.

Providers and employers must check that candidates are not:

- subject to a prohibition order issued by the Secretary of State.
- prohibited to teach in another country of the European Economic Area (EEA).

The list of prohibited teachers is on the Teacher Services system.

Our staff recruitment policies and practices are rigorous and comply with safe recruitment and selection requirements. We always pursue identity checks and qualification checks, and we take up and scrutinise written references.

- Identity checks must be carried out on all conditional offers made before the commencement of training.
- IFT completes online searches as part of their due diligence checks on applications.
- All successful applicants will have an enhanced DBS check before starting the programme.
- All trainees should wear their placement school ID badge when on placement.
- The trainee should bring in their original DBS certificateto the IFT Hub Lead, this is noted on their SCR, which is accessible to the central IFT Team.
- All trainees will receive Child Protection, Safeguarding and Prevent training during their training. This includes online units from the National College as part of induction with completion certificates are uploaded to Mosaic.
- Trainees also participate in school level training.
- All placement schools must make their Safeguarding, Child Protection policies and Code of Conduct available to the trainee and induct them on the policies and procedures. These must be adhered to by the trainee.
- Trainees need to follow the placement school's policy on taking photographs of children. Personal cameras, personal mobile phones, or other personal devices should not be used to take photographs of pupils.
- All trainees are to sign a register when attending centre-based and subject/phase-based training.

4. Training and Development

For IFT staff and trainees to be able to understand and discharge their safeguarding and child protection duties, IFT will ensure all trainees carry out safeguarding training in their placement school as well as in their centre-based training. We will also ensure all IFT staff and trainees are up to date with safeguarding procedures and national initiatives, and all trainees have read, understood, and signed the IFT specific contract.

5. Reporting concerns

If a member of IFT staff is visiting a school and receives a disclosure from a member of the school community or notices anything of concern, they will follow the school's safeguarding procedures for reporting and referring.

6. Allegations against IFT trainees or staff

IFT recognises there are situations where it is possible for trainees or staff to conduct themselves in a manner that may be deemed to be causing harm to children and takes any allegation seriously. IFT is guided by local procedures for managing allegations against staff or trainees.

- If a concern is raised about a member of IFT staff, this should be referred to Director of IFT.
- If a concern is raised about the Director of IFT it should be referred to the Executive Director of Education.

Allegations against staff will follow the employing school's or HISP safeguarding and child protection policies and disciplinary procedures.

If a concern is raised about a trainee on the IFT course, the ITT Hub Lead for that course must be informed immediately.

6.1 Low-level concerns

'Low-level' concerns are those that are deemed not to have met the harm threshold as set out in KCSIE 2026. 'Low-level' does not mean that it is insignificant. Low-level concerns could include a trainee who is inconsistent with the staff code of conduct, has favourites within the classroom or takes photos of children on their mobile phone, contrary to the school policy. This is not an exhaustive list, and low-level concerns may arise in several ways and from several sources.

All low-level concerns should be referred to the ITT Hub Lead. The school's Lead Mentor and the ITT Hub Lead will have a formal, recorded conversation with the trainee about the concern and clearly explain the correct procedures that should be followed. If it is appropriate, they may be placed on a Cause for Concern that relates to Part 2 of the Teachers' Standards. The Cause for Concern procedures are documented in the Course Handbook. All low-level concerns are reported to the Executive Partnership Board of IFT.

All low-level concerns should be recorded in writing, including the details of the concern, the context in which the concern arose, and the action taken. The record will be saved in the trainee's electronic, password protected folder. As per the GDPR policy, trainees' files are saved for seven years following their completion, withdrawal, or suspension from the course. Low-level concerns will only be used in references if they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

6.2 Concerns or allegations that meet the harm threshold

Allegations that meet the harm threshold are defined in KCSIE 2026 as being where any person who works in a school or college that provides education for children under 18 years of age, has:

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

In the event of an allegation against an IFT staff member, the HISP safeguarding policy will be followed. In the event of an allegation against a trainee that meets the threshold, the placement school must follow their school's safeguarding policy, including looking after the welfare of the child and investigating and supporting the person subject to the allegation. The placement school must also inform the IFT Hub Lead - Director of IFT immediately. The placement school or the IFT Hub Lead may ask the trainee to leave the school premises immediately, temporarily pausing the placement, while investigations are conducted. The Director of School Improvement and Safeguarding, Teresa Enriquez-Hayes (t.enriquez-hayes@hispmat.org) must be made aware of the investigation by the IFT Director.

The Headteacher of the placement school in collaboration with the ITT Hub Lead and Director of IFT will inform the Local Authority Designated Officer (LADO). When dealing with allegations, the placement school and IFT should:

- apply common sense and judgement;
- deal with allegations quickly, fairly, and consistently;
- provide effective protection for the child and support the person subject to the allegation.

Following investigation by the LADO that leads to no further action, the Director of IFT and LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerns and by whom.

Where further enquiries are required, the trainee may be suspended* (*Suspension may include a withdrawal from or failure of the course) from the course, following advice from the LADO. The Director of IFT will record the rationale and justification for such a course of action, writing to the trainee to inform them of the decision within one working day. DfE Register will be updated by the IFT administrators. The process for allegations that meet the harm threshold, as set out in KCSIE 2025 will be followed.

Records of the allegation which are found to be malicious or false will be removed from the trainee's records unless they give consent for retention of the information.

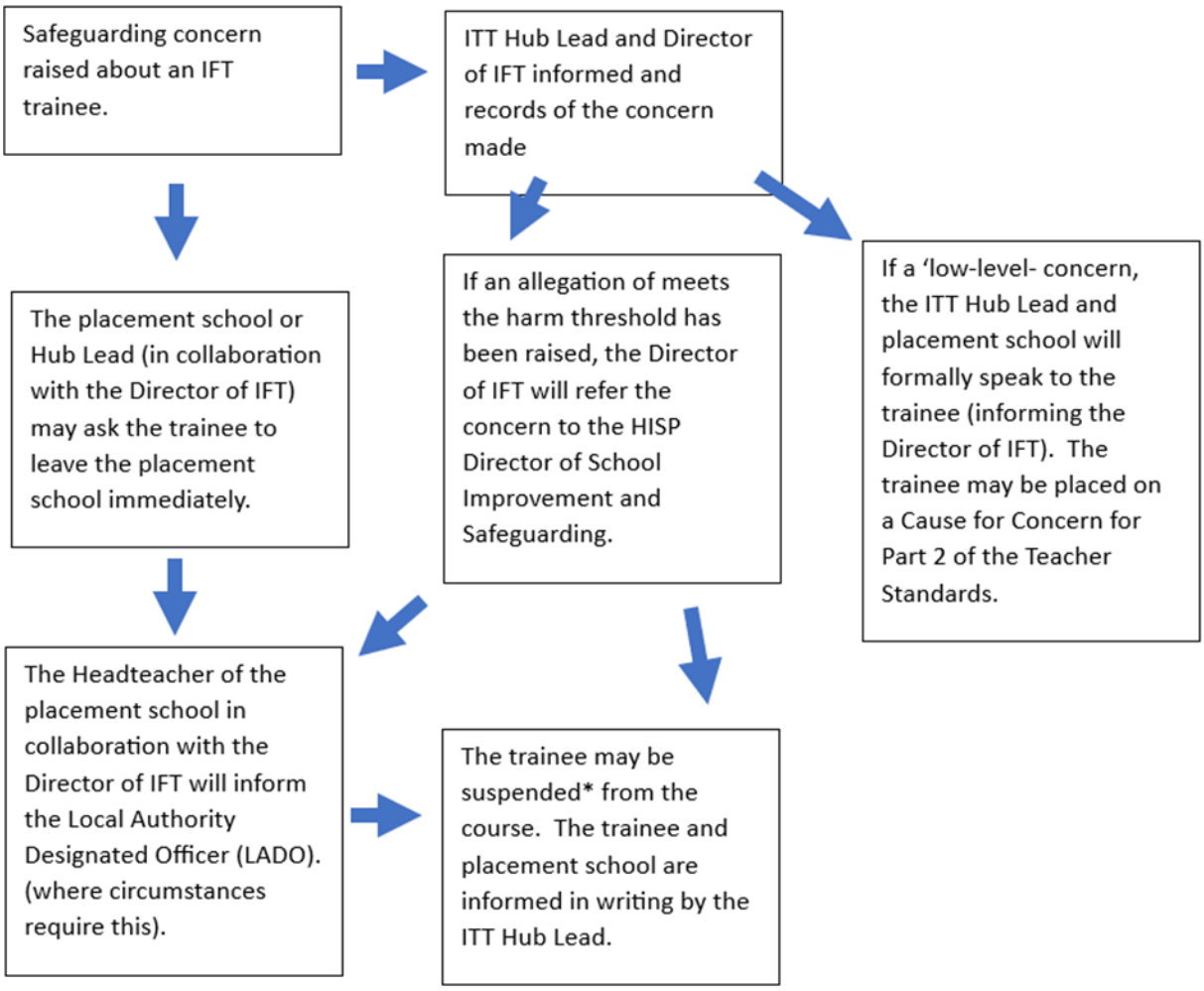
For all other allegations (substantiated, unfounded, and unsubstantiated), a record of will be kept securely in a password protected folder until the trainee has reached normal pension age or for a period of 10 years from the date of the allegation. The record will include:

- a clear and comprehensive summary of the allegation.
- details of how the allegation was followed up and resolved.
- a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated.
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

All trainee records will be kept in accordance with all applicable data protection legislation. Trainee records will be maintained according to the Hub organisation's data policies and retention schedules, with coordination between the Hub and IFT to ensure records are available, accurate, and securely stored.

If a trainee is removed from the programme because they have harmed or pose a risk of harm to children, or if IFT, as the accredited ITT provider, would have removed the trainee had they not left, the Director of IFT (in collaboration with the IFT Hub Lead, the Director of School Improvement and Safeguarding) will seek guidance from DBS and inform DfE by contacting itt.safeguarding@education.gov.uk

6.3 Reporting safeguarding concerns about an IFT trainee flowchart


Safeguarding concern raised about an IFT trainee.
ITT Hub Lead and Director of IFT informed and records of the concern made
The placement school or Hub Lead (in collaboration with the Director of IFT) may ask the trainee to leave the placement school immediately.
If an allegation of meets the harm threshold has been raised, the Director of IFT will refer the concern to the HISP Director of School Improvement and Safeguarding.
If a 'low-level- concern, the ITT Hub Lead and placement school will formally speak to the trainee (informing the Director of IFT). The trainee may be placed on a Cause for Concern for Part 2 of the Teacher Standards.
The Headteacher of the placement school in collaboration with the Director of IFT will inform the Local Authority Designated Officer (LADO). (where circumstances require this).
The trainee may be suspended* from the course. The trainee and placement school are informed in writing by the ITT Hub Lead.