



Safeguarding and Child Protection Policy 2026-27

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Part 1

This aims of Part 1 of this policy is to establish the trust-wide safeguarding framework, expectations and standards that every school within the trust must follow.

1A – is the strategic policy that sets statutory requirements. This policy will be agreed by the Trust Board.

1B – This is the operational CIT Trust requirements. This part of the policy will be set out by the Director of Safeguarding.

Part 2 will establish how each individual setting will apply the policy to its own unique contextual operational practice.

Section 1A

Safeguarding Policy and Executive Summary

1. Purpose

Through this policy we intend to establish:

- to clarify the roles and responsibilities of everyone within our school in relation to child protection and safeguarding
- to provide information on the range of safeguarding concerns
- to explain the clear procedures that are followed when a child is identified as needing more than universal services can provide.

Consistent safeguarding culture expectations across all CIT schools so that:

- Safeguarding is viewed consistently across all academies.
- Staff understand common expectations and procedures.
- Children receive the same level of protection regardless of which trust school they attend.

Clear definition of Trust governance and accountability including:

- Trust Board responsibilities.
- Safeguarding Trustee responsibilities.
- CEO and Executive Team responsibilities.
- Trust Safeguarding Lead responsibilities.
- How safeguarding assurance and challenge are provided to schools.

Explicit and unambiguous non-negotiable safeguarding standards for areas such as:

- Recruitment and SCR compliance.
- DSL training requirements.
- Safeguarding audits.
- CPOMS/recording standards.
- Low-level concerns management.
- Attendance monitoring.

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- Allegation management.
- Quality assurance processes, ensuring that every school meets the same minimum standard.

Strong quality assurance and compliance across all CIT schools and audit schools against a common standard. This will enable the Trust to:

- Identify weaknesses across the trust.
- Monitor training compliance.
- Benchmark safeguarding performance.
- Demonstrate due diligence to Ofsted and regulators.

Clarifies escalation routes

- When schools contact the Trust Safeguarding Lead.
- When Trust leaders become involved in serious incidents.
- How schools access support and challenge.
- Escalation processes for allegations involving Headteachers.

Individual schools complete Part 2 of this policy, which sets out their own contextualised safeguarding information to illustrate how Part 1 of this policy will be operationally delivered.

2. CIT Commitment to Safeguarding

CIT as a Trust always aims to work in partnership with all our schools to ensure that safeguarding is truly **'everyone's responsibility'**.

The Trust Board and the Executive leadership recognise the contribution the Trust can and must make to safeguard and support children and young people in all its schools. Their welfare is of paramount importance.

The Trust expects all schools to adhere to the central expectations set out in Part 1 of this policy – including the 5 Safeguarding Principles as follows:

- **Responsibility** – All staff and volunteers who choose to work in CIT schools do this on the understanding that we believe safeguarding is everybody's responsibility. All of us have a responsibility to follow all trust and school policies and the CIT code of conduct.
- **Readiness** – All staff and volunteers will adhere to the principle that 'It could happen here' and undergo the necessary, safeguarding training required by CIT to enable all our pupils and staff to keep safe.
- **Reporting** – Everyone who works and volunteers in our schools will understand what to look for and how to report concerns to the safeguarding leads in whatever school they are working in. Records will be kept in line with the school Safeguarding Policy.
- **Reacting** – All schools will know what action to take to address every concern raised including when to alert CIT central team or external agencies where necessary.
- **Responding** – Leaders at schools will make sure there is the appropriate help, support and ongoing work done to make sure pupils stay safe over time.

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The Central **Safe@CIT** Team will provide ongoing support and challenge to all schools to ensure the policies in place are consistently put into practice.

Anyone worried about a child must continue to raise the concern until they have a reason not to be worried about the child anymore.

3. Scope

This policy in its entirety sets out the Trust-wide safeguarding and child protection framework for all Community Inclusive Trust academies.

It defines the safeguarding responsibilities of Trustees, Local School Boards, leaders, staff and volunteers; establishes the safeguarding standards expected across all schools; and describes how the Trust assures itself that children are safe. In Part 2 of this policy, individual schools will set out their contextual local safeguarding and child protection offer that reflects their own operational procedures.

This policy applies to all children and young people on roll at this school (see paragraph 4.2 for clarification of terms in relation to what we refer to as a 'child')

Anyone encountering children in our school or visiting the school site must abide by this policy.

Everyone working at the school as a member of staff, or volunteer (including in a governance role), has a duty to safeguard and protect our children. They must read this policy and sign to say they have read it and understood it.

Visitors to the school, including contractors, must have the information they need to both keep themselves safe on site and keep our children and staff safe.

4. Equality statement

At CIT we recognise our obligations under the [Equality Act 2010: advice for schools](#) that we must not unlawfully discriminate against staff or pupils because of their disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. (protected characteristics).

We will ensure that all staff are aware of our duty to eliminate discrimination and advance equality for people with protected characteristics.

In relation to safeguarding and promoting the welfare of children our governing body will carefully consider how we are supporting our staff and pupils in line with our CIT Equality Policy: [Equity-Diversity-Inclusion-Policy-February-2025.pdf](#)

5. Core Statutory Guidance

This policy is in accordance with the principles established by the Children Acts 1989 and 2004, the Education Act 2002, the Children and Social Work Act 2017, Working Together to Safeguard Children, Keeping Children Safe in Education 2026, and other relevant statutory guidance and legislation.

Keeping Children Safe in Education (KCSIE) 2026 – Department for Education

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The principal statutory safeguarding guidance for schools and colleges.

This document sets out duties relating to safeguarding, child protection, safer recruitment, allegations against staff, online safety, and the role of the DSL. Schools must have regard to this guidance.

All staff and volunteers must read Part 1 of this guidance in full.

Working Together to Safeguard Children (currently 2026 guidance, replacing the 2023 version where applicable)

Sets out how organisations and agencies should work together to safeguard and promote children's welfare.

Establishes multi-agency safeguarding arrangements and expectations for information sharing and referrals.

The Teachers' Standards 2012 state that teachers, including headteachers, must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions; and maintain public trust in the teaching profession as part of their professional duties.

7. Safeguarding Legislation

The safeguarding and child protection responsibilities of the Trust and all CIT schools are underpinned by a range of statutory legislation, government guidance and local safeguarding procedures. This policy should be read in conjunction with the legislation and guidance listed below, all of which inform the approach to promoting the welfare of children, protecting them from harm, and ensuring that safeguarding remains everyone's responsibility. CIT schools (informed by the Trust's central Safe@CIT Team) will have regard to any updates or revisions to these documents and will implement safeguarding practices in line with current statutory requirements.

- Children Act 1989
- Children Act 2004
- Education Act 2002 (Section 175 and Section 157 duties)
- Safeguarding Vulnerable Groups Act 2006
- Children and Social Work Act 2017
- Data Protection Act 2018 and UK GDPR
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Domestic Abuse Act 2021
- Human Rights Act 1998
- Equality Act 2010

Other Statutory/Departmental Guidance referenced in Safeguarding:

- The Prevent Duty Guidance: England and Wales (for radicalisation and extremism)
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
- Disqualification under the Childcare Act 2006
- [Use of reasonable force and other restrictive interventions guidance](#)
- [Behaviour in Schools - Advice for headteachers and school staff Feb 2024](#)

- [Relationships Education, Relationships and Sex Education and Health Education guidance](#)
- [Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement](#)
- [Supporting children and young people with medical conditions and allergy](#)

8. Policy Executive Summary

Safeguarding and promoting the welfare of children includes providing help and support as soon as problems emerge; protecting children from maltreatment inside or outside the home, including online; preventing impairment of physical or mental health or development; ensuring safe and effective care; and taking action to enable the best outcomes.

Child protection is the part of safeguarding activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm, including harm inside or outside the home and online.

Family Help is used in this framework to describe targeted multi-agency help where a family needs more coordinated support. Community-based early help and universal services should be used promptly where they can meet emerging needs.

Governance and accountability across CIT

The CIT Trust Board, as the proprietor of the academies, holds collective strategic responsibility and accountability for safeguarding. Delegation of assurance activity to Local School Boards does not remove or diminish the Trust Board's accountability.

The Trust Board approves this Trust-wide safeguarding policy and receives sufficient assurance to determine whether safeguarding arrangements are effective and compliant.

A named Safeguarding Trustee supports scrutiny but does not replace the collective responsibility of the Board.

LSBs provide local scrutiny, challenge and assurance in accordance with the Scheme of Delegation and the CIT assurance schedule. They scrutinise the school's Local Safeguarding Arrangements and report material risks, weaknesses and actions to the Trust Board.

The CEO and Executive Team ensure that Trust-wide systems, resources, specialist safeguarding leadership and escalation arrangements are effective.

The Director of Safeguarding leads Safe@CIT support, challenge, quality assurance and reporting across the Trust.

All staff will adhere to the roles and responsibilities for safeguarding as set out in Paragraph 3 of Section 1B – Trust Operational Procedures.

Safeguarding culture and reporting concerns

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Every CIT school must have simple, visible and well-understood arrangements for reporting concerns about children and about adults. A concern is a safeguarding matter until appropriately assessed; staff must not wait for proof.

Concerns, disclosures and relevant incidents are recorded promptly on the Trust safeguarding recording system (CPOMS) or the agreed contingency system.

Immediate risk is acted upon without delay, including contact with emergency services where necessary.

Staff understand escalation routes where they believe a response is inadequate.

Children are supported to speak, including those who communicate non-verbally or face additional barriers to disclosure.

Safeguarding concerns can overlap; leaders consider the whole child, family, peer group, online environment and extra-familial context.

Family Help, referrals and multi-agency working

Schools will identify needs early and work with universal services, community-based early help and targeted Family Help. Where a child is suffering or likely to suffer significant harm, or where statutory intervention may be required, the school will make an appropriate referral to children's social care without delay and follow local threshold and assessment protocols.

The DSL may lead or contribute to Family Help or other assessments where this is consistent with local arrangements and professional competence.

Information will be shared lawfully, proportionately and promptly where this is necessary to safeguard a child.

Where a crime may have been committed, the police will be involved as appropriate.

Radicalisation concerns will be managed in accordance with the Prevent duty and Channel arrangements.

Where a referral or external response does not adequately protect a child, the DSL will use local escalation procedures.

Children potentially at greater risk

CIT recognises that some children face additional barriers to help or are disproportionately affected by harm. Schools will identify and respond to needs rather than relying on labels.

- Children with SEND or disabilities, including communication barriers and risk of assumptions about behaviour.
- Children in care, previously looked-after children and children with a social worker.
- Young carers.
- Children with medical conditions or mental health needs.
- Children absent from education or at risk of missing education.
- Children in alternative provision or receiving education off site.
- Children affected by domestic abuse, exploitation, homelessness or temporary accommodation, family imprisonment, private fostering or kinship care.

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- Children who are lesbian, gay or bisexual, or who are questioning their gender; support will be sensitive, individual and safeguarding-led, with decisions made lawfully and in the child's best interests.

Child-on-child abuse, harassment and violence

CIT will not minimise child-on-child abuse as “banter”, “part of growing up” or an inevitable part of school life. It can occur inside or outside school and online, and may affect both the child harmed and the child whose behaviour is harmful.

The operational guidance and Appendix 1 of this document will set out the scope of what the Trust expects schools to do in response to Child on Child abuse and its full definition.

Online safety, AI, mobile phones and filtering/monitoring

Online safety is integral to safeguarding. Schools must address the four broad areas of online risk - content, contact, conduct and commerce - and emerging risks including generative AI, deepfakes, AI-generated sexual imagery, cybercrime and exploitation.

Each school must implement the Trust's mobile-phone and digital-use expectations and teach safe, responsible and respectful use of technology.

Appropriate filtering and monitoring systems must be in place across school internet-connected devices and relevant locations.

The effectiveness of filtering and monitoring must be reviewed at least once every academic year by the responsible leader. The review must include checks that filtering works appropriately across devices and locations and a record of the checks must be retained.

Leaders and relevant staff must understand the filtering and monitoring arrangements, how concerns are escalated and how over-blocking/under-blocking risks are managed.

Use of generative AI in education must be safe, lawful, transparent and consistent with safeguarding, data protection and information security requirements.

Attendance, alternative provision and children missing education

Attendance is a safeguarding issue. Persistent or unexplained absence can be an indicator of abuse, neglect, exploitation, mental health difficulties or other unmet need.

Schools will monitor patterns and causes of absence, with particular attention to children already known to be vulnerable.

Children absent from education and children missing education will be managed using current statutory attendance and local authority procedures.

Elective home education requests will be considered in the context of known safeguarding concerns and information shared with the local authority as required.

Where alternative provision is used, the commissioning school retains safeguarding responsibility, ensures appropriate checks and information sharing, and monitors attendance, welfare, quality and ongoing suitability.

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Schools will work with Virtual School Heads where relevant to support attendance and outcomes for children in care and children with a social worker.

Safer recruitment and suitability

CIT will operate safer recruitment arrangements in accordance with KCSIE 2026 and the separate CIT Safer Recruitment Policy. The Trust will maintain compliant Single Central Records and complete appropriate identity, right-to-work, DBS, barred-list, prohibition, section 128, qualification and overseas checks as applicable.

All volunteers are risk assessed and checked at the level required for their role.

All volunteers on overnight school trips who meet the statutory definition of regulated activity are checked accordingly.

Trainee teachers, supply staff, contractors and third-party staff are included within safeguarding and safer recruitment arrangements appropriate to their status and role.

Where EYFS requirements apply, staff or volunteers must not begin work in relevant regulated activity before the required enhanced DBS certificate, including barred-list information, has been received where the statutory framework requires this.

Concerns or allegations about adults

All concerns about adults working with children - including staff, supply staff, trainee teachers, volunteers and contractors - must be reported. Concerns are managed according to whether they may meet the harm threshold or are low-level concerns inconsistent with the Code of Conduct.

All CIT staff and volunteers will follow the Low-Level Concerns Policy in Appendix 2 of this document.

Concerns about a member of staff are reported to the Headteacher.

Concerns about a Headteacher are reported to the relevant Director of Education, who will liaise with the LADO and relevant Trust leaders as required.

Concerns relating to central Trust leadership are reported through the Trust's designated safeguarding escalation route.

LADO advice/referral is considered where required.

Low-level concerns are recorded, reviewed for patterns and addressed in accordance with the CIT Low-Level Concerns Procedure.

Whistleblowing routes remain available where an individual believes safeguarding concerns are not being addressed appropriately.

Information sharing, records and transfer

Safeguarding information will be handled in accordance with data protection law, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Data protection is not a barrier to sharing information when this is necessary and proportionate to safeguard a child.

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Safeguarding records must be clear, factual and distinguish observed concerns, professional opinion and historic information.

Decisions, actions, outcomes and reasons for decisions must be recorded.

Child protection files are held securely and separately from the main pupil file where appropriate.

For an in-year transfer, the child protection file must be transferred as soon as possible and within 5 days. For a transfer at the start of a new term, it must be transferred within the first 5 days of term. Secure transit and confirmation of receipt are required.

The exporting school must include a clear structured summary of current concerns, relevant context and ongoing support, distinguishing current risks from historic information.

The receiving school must ensure the information is reviewed promptly by an appropriately trained member of staff, clarify incomplete information where necessary, and put appropriate safety/support arrangements in place.

Curriculum and preventative education

Safeguarding is embedded in a broad, balanced and age-appropriate curriculum. Through RSHE/Relationships Education, Health Education, online safety, assemblies, pastoral work and wider curriculum opportunities, pupils will learn about healthy relationships, consent, respectful behaviour, online risks, mental wellbeing, exploitation, discrimination, equality, extremism, personal safety and how to seek help.

Preventative education will be responsive to school context and emerging risks, including violence against women and girls, misogyny, racism and harmful attitudes or behaviours. Schools will create a culture that promotes respect and does not tolerate harassment or abuse.

School premises, sport and external users

Schools will comply with safeguarding and premises requirements, including appropriate arrangements for toilets, changing and showers, privacy and supervision. Requests relating to social transition, facilities or participation in sport will be considered lawfully, individually and with regard to safeguarding, safety, fairness, dignity, equality duties and the interests of all children affected.

Where single-sex sport is necessary for safety or fairness under the Equality Act 2010, schools will apply the relevant exception and make arrangements based on biological sex where required. Requests for different participation arrangements will be considered case by case in line with current DfE guidance and safeguarding duties.

Where premises are used by external organisations or individuals, schools will obtain proportionate safeguarding assurance through written agreements, including arrangements for safeguarding policies, safer recruitment, designated safeguarding responsibility, reporting concerns, supervision, site security and escalation. Safeguarding allegations arising from such provision will be managed under the school and Trust safeguarding arrangements, including LADO involvement where appropriate.

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Quality assurance and governance reporting

The Safe@CIT Team and Directors of Education will test the accuracy and impact of school safeguarding arrangements through a planned annual assurance cycle. This includes school self-evaluation, Trust safeguarding audits, termly review activity, school reviews and a programme of external review.

Headteachers maintain an accurate safeguarding self-evaluation and action plan.

LSBs receive evidence-based safeguarding information, test impact and report risks and assurance through the agreed Trust cycle.

The Director of Safeguarding reports Trust-wide themes, risks, actions and assurance to the Trust Board, including relevant data and trends.

Material weaknesses or non-compliance are escalated promptly and followed through to resolution.

Audit and review activity considers safeguarding culture and the lived experience/voice of children, not compliance alone.

Related CIT documents and review

This policy should be read with the CIT Safeguarding Procedures, each school's Local Safeguarding Arrangements, and relevant Trust policies including Safer Recruitment, Staff Code of Conduct, Allegations of Abuse Made Against Staff, Whistleblowing, Behaviour, Attendance, Restrictive Intervention, Supporting Pupils with Medical Conditions, Online Safety/Digital Use, Complaints, SEND and LAC/CiC arrangements.

The Director of Safeguarding will review this policy at least annually and sooner where statutory guidance, legislation, local safeguarding arrangements or Trust practice changes. The Trust Board will approve the Trust-wide policy. LSBs will scrutinise school-level implementation and local arrangements through delegated assurance.

Part 1B CIT Trust Operational Expectations and Guidance

This section expands on the Executive Summary and gives further detail about Trust expectations for the operations of safeguarding.

1.1. Definitions

1.2 This is both a safeguarding and child protection policy.

The Trust recognises there are key differences between the two terms. We define them as follows:

Safeguarding is:

- 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
- Taking action to enable all children to have the best outcomes.

Safeguarding is not just about protecting children from deliberate harm. It also relates to the broader aspects of care and education including:

- Pupils' health and safety and emotional well-being, and their mental and physical health or development.
- Meeting the needs of children with special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid.
- Educational visits and off- site education.
- Intimate care and emotional wellbeing.
- On-line safety and associated issues.
- Appropriate arrangements to ensure school safety and security, considering the local context.
- Keeping children safe from risks, harm, exploitation and sexual violence and sexual harassment between children:

Child Protection is:

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

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1.3. The term 'child'

Under the Children's act 1989, the legal definition of a child, as per the law in the UK, is anyone under the age of 18.

However, In England, young people are required to participate in education or training until the age of 18.

Schools and colleges still have duty of care and safeguarding responsibilities towards adult students and should respond to concerns about abuse, exploitation, mental health, radicalisation, coercion, domestic abuse, and other welfare issues.

The term 'child' will also cover the safeguarding needs of pupils who are in Year 14 of some specialist settings in the Trust

If the 18-year-old has care and support needs and is unable to protect themselves from abuse or neglect, they may fall within adult safeguarding procedures under the Care Act 2014. However, the Trust expects that in CIT schools this policy still applies to all students in our care.

1.4. Parent

The term 'parent' refers to both parents and carers.

1.5. Family Help and Early Help

Family Help is the service or system of support that delivers help to children and families, often bringing together early intervention, targeted support and multi-agency working.

Early Help is the approach of identifying needs and providing support as soon as problems emerge, to prevent them from escalating.

The Trust defines Early Help as providing timely, coordinated support to children, young people, and families when difficulties first arise. It is a collaborative approach that seeks to improve outcomes, build resilience, and prevent problems from escalating to the point where specialist or statutory services are required.

1.6. Significant Harm

Significant harm is the level of abuse, neglect or impairment of a child's health or development that is sufficiently serious to justify statutory intervention to protect the child.

This is the definition commonly used in safeguarding practice, child protection conferences, and Section 47 enquiries.

1.7. Professional Curiosity

The Trust defines this as the ability and willingness to ask questions, seek further information, and critically explore situations rather than accepting things at face value, to make informed decisions and safeguard others' wellbeing.

This may include respectfully questioning, observing, and seeking evidence to understand a child's or family's circumstances and identify potential risks.

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1.8. Acronyms used in this policy. There are some commonly used acronyms that appear more than once – which are set out here. Where you see these acronyms, this defines what they stand for throughout this policy:

- KCSiE 2026 – Keeping Children Safe in Education 2026
 - DSL – Designated Safeguarding Lead
 - DDSL – Deputy Designated Safeguarding Lead
 - LSB – Local School Board
 - LAC/CiC – Looked After Child/Child in Care
 - CIT – Community Inclusive Trust
 - HSB – Harmful Sexual Behaviour
 - CCE – Child Criminal Exploitation
 - CSE – Child Sexual Exploitation
 - VAWG – Violence Against Women and Girls
 - FGM – Female Genital Mutilation
 - CPOMS - Child Protection Online Management System.
- The Trust uses CPOMS as its primary safeguarding recording system

2.1. Safeguarding Governance Across CIT

2.2. Trust-wide oversight

The responsibility for the governance of safeguarding in schools sits with the CIT Trust Board.

Paragraph 82 of KCSiE 2026 sets out that:

Governing bodies and proprietors have a strategic leadership responsibility for their school or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

The Trust Board have delegated a set of assurances to the school LSB which are set out in the CIT assurances schedule. This includes the monitoring and reporting of the effectiveness of Safeguarding.

This delegation of assurance activities does not remove or diminish the Trust Board's collective responsibility and accountability for safeguarding. The Trust Board will take reasonable steps to verify the effectiveness of local safeguarding arrangements from individual school LSBs and will intervene where assurance indicates weaknesses, non-compliance or risks to children.

2.3 Reporting arrangements

The assurances for the effectiveness of safeguarding will be reported to the Trust using the following mechanisms:

- The Director of Safeguarding report to the Trust Board.

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This will include a summary of key reportable data for analysis to ensure certain groups are not unfairly disadvantaged in areas such as exclusions and suspensions and physical interventions.

- LSB report to the Trust Board via the SOAP (School on a Page report)

The LSB will complete the Trust reporting template using information from their monitoring activities and the Headteacher's Report.

The Trust Board will receive feedback on the effectiveness of safeguarding from the executive (Directors of Education and Director of Safeguarding) as part of the reporting of School Review findings for all CIT schools.

This will include strengths, areas to be addressed and how these will be rapidly dealt with.

3.1 Roles and Responsibilities

Safeguarding and promoting the welfare of children at this school and across CIT is **everyone's responsibility**.

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the school.

All CIT staff and volunteers, regardless of role, are expected to understand they have a role to play in safeguarding children and will always consider what is in the best interests of children.

All staff and volunteers within our schools are particularly important as they can identify concerns early and provide help to children to prevent concerns from escalating.

All staff are aware of the Family and Early Help process and understand their role in this.

This includes being able to identify emerging problems to recognise children who may benefit from early help. Staff know in the first instance to discuss their concerns with the Designated Safeguarding Lead and understand they may be required to support other agencies and professionals in assessments for early help.

3.2 All Staff responsibilities

All staff have a key role to play in identifying and reporting concerns and provide early help for children.

All staff follow the school's Child Protection Procedures which are consistent with:

- [Working Together to Safeguard Children](#),
- [Keeping Children Safe in Education](#);

Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, children, parents, and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

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All staff will have an awareness of the main types of abuse and their signs and symptoms, as well as specific safeguarding issues such as Domestic Abuse, Child Exploitation (CE), Radicalisation and the Prevent Duty, Female Genital Mutilation (FGM), Attendance and Children Missing from Education (CME).

All staff will know and understand the key contextual safeguarding issues facing their individual school and pupils as set out in Para 2 in Part 2 of this policy.

All staff will also be aware that safeguarding concerns can manifest themselves via child-on-child abuse. This is most likely to include but is not limited to: bullying (including online bullying), gender-based violence/sexual assaults and sexting. Staff are clear as to the school's procedures with regards to child-on-child abuse.

All members of staff have a duty to recognise concerns and report them quickly. Staff should show professional curiosity and maintain an open mind.

It is *not* the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. Accordingly, all concerns regarding the welfare of children will be recorded and discussed with the DSL (or the deputy DSL in their absence) and follow the expectations set out in Part 2 of this policy.

Any concerns or disclosures **MUST** be reported as soon as possible to the safeguarding team in school. **CIT expects that this is ideally within 15 minutes of it being raised.**

All concerns must be reported to the school safeguarding team by the end of the school day before staff leave the site.

Concerns that staff must act on immediately and report:

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the expected knocks or scrapes received in play.
- Any explanation given to the above which appears inconsistent or suspicious
- Any behaviours which give rise to suspicions that a child may have suffered harm (e.g., worrying drawings or play)
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- Any concerns that a child is presenting signs or symptoms of abuse or neglect
- Any significant changes in a child's presentation, including non-attendance
- Any hint or disclosure of abuse or harm/risk of harm from any person
- Any concerns regarding person(s) who may pose a risk to children (e.g., living in a household with children present)
- Any potential indicators of Child Exploitation
- Any potential indicators of FGM
- Any potential indicators of Radicalisation
- Any potential indicators of living in a household with Domestic Abuse.

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To create a culture where children feel confident to talk and disclose when they need help, ALL staff will:

- Read and understand this policy.
- Read and ensure understanding of the required statutory guidance.
- Complete all required training (including induction where appropriate) within the deadline so they are aware of and alert to the signs of abuse.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to social care, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the NSCP and take account of guidance issued by the DfE KCSiE 2026.
- Support pupils in line with their child protection plan, child in need plan, LAC/CiC Care Plan.
- Treat information with the required confidentiality but never promising to “keep a secret”.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Understand Family and Early Help (FH/EH) and be prepared to identify and support children who may benefit from any form of early help.
- Liaise with other agencies that support pupils and provide early help as directed by the school safeguarding team.
- Ensure they know who the DSL and Deputy DSLs are and know how to contact them.
- Have an awareness of wider school and Trust safeguarding policies such as the Behaviour Policy, the CIT Code of Conduct, procedures relating to the safeguarding response for children who go missing or who are absent from education and the role of the DSL.
- Report to the Headteacher if their DBS or Disqualification from Childcare status changes.

3.3 Teachers (including ECTs) and Headteachers – Professional Duty

The Teachers Standards 2012 (updated 13 December 2021) remind us that teachers, early career teachers and headteachers should safeguard children and maintain public trust in the teaching profession as part of our professional duties.

3.4 The Trust Board and Local School Board (LSB)

9.4.1 The Trust Board

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The Trust will be responsible for ensuring that all LSB members receive safeguarding training on induction which is regularly updated. This training will be appropriate to their role offering strategic challenge to the school.

The Trust Board are responsible for ensuring that all CIT schools promote inclusive, anti-discriminatory cultures in which racism and other forms of discriminatory practice and behaviour are recognised, challenged and addressed as part of the Board's safeguarding responsibilities.

The Trust Board will nominate a named Safeguarding Trustee who will report back on the effectiveness of the LSB in supporting safeguarding leaders in school.

The Trust Board will seek the following assurances from all CIT schools:

- All schools fully meet statutory safeguarding duties as set out in Part One of Keeping Children Safe in Education 2026.
- Appropriate safeguarding policies (including online safety) and procedures are in place and implemented effectively, reviewed as required by statutory guidance and published by schools appropriately.
- Safer recruitment requirements from KCSiE 2026 are complied with for all staff and volunteers.
- Staff, governors and trustees receive appropriate safeguarding training and that it is updated regularly.
- Safeguarding risks are identified, managed and escalated appropriately.
- Children are safeguarded from harm, and their welfare is actively promoted.
- Effective monitoring, audit and quality assurance processes are in place.
- All schools follow procedures for dealing with allegations against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures. Including those for low level concerns.
- The Trust has implemented appropriate electronic filtering and monitoring systems in place which are reviewed regularly to ensure effectiveness. This is to ensure that children are safeguarded from potentially harmful and inappropriate online material.

3.5. The Local School Boards (LSBs)

As set out in paragraph 8, LSBs have a delegated responsibility for assurance on safeguarding within their individual schools.

LSBs will be responsible for providing scrutiny, challenge and assurance regarding the effectiveness of safeguarding within their respective schools, including compliance with statutory requirements, the implementation of Trust safeguarding policies, the culture of safeguarding, and the effectiveness of leadership and practice.

They must report to the Trust Board within the agreed cycle, highlighting strengths, risks, areas for improvement and any significant safeguarding concerns.

LSB Responsibilities include:

- There is a named individual member of the LSB who will champion issues to do with

safeguarding children and child protection within the school, liaise with the Designated Safeguarding Lead, and provide information and compliance/monitoring reports to the LSB and to the Trust Board.

- In accordance with the statutory guidance “Keeping children safe in education” 2026, ensure that the school has its own contextual child protection/safeguarding Part 2 policy, procedures and training in place which are effective and always comply with the law. The policy is made available publicly.
- Providing the Trust Board with assurances that the school has met its safeguarding duty and safeguarding is judged by leaders and the Director of Safeguarding to be effective. (When assessed against the CIT Safeguarding Audit Framework and KCSiE 2026)
- Challenging the Headteacher and leaders responsible for safeguarding in the school to address any areas of the CIT Safeguarding Audit Framework that are not self-assessed by the school and the TSL as being effective.
- Ensuring the school completes and returns the local authority annual Safeguarding Return.
- The school operates CIT safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Headteacher, nominated LSB members and other staff involved in the recruitment process have undertaken Safer Recruitment Training.
- The school follows the CIT policies for dealing with safeguarding concerns (including lower-level concerns) and allegations of abuse against members of staff and volunteers.
- There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection (the “Designated Safeguarding Lead”) and there is always cover for this role with appropriate arrangements for before/after school and out of term time activities.
- The Designated Safeguarding Lead undertakes effective DSL specific training as set out in the CIT 3-year pathway. (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) using safeguarding briefings etc.
- The Headteacher, and all other staff and volunteers who work with children (including early years practitioners within any settings on the school site), undertake appropriate training which follows the CIT 3-Year Pathway; and new staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities (including this policy, Part 1 of Keeping Children Safe in Education the pupil behaviour policy, the CIT Code of Conduct, the role of the Designated Safeguarding Lead and how to respond to children who go missing from education). The CIT Induction and annual training packages will be used as part of this induction.
- Any deficiencies or weaknesses brought to the attention of the LSB will be rectified without delay.
- That the appropriate Director of Education initially deals with any safeguarding concerns or allegations of abuse made against the Headteacher, in liaison with the Local Authority Allegations Manager (LADO). This will be supported where appropriate by the HR team and the Director of Safeguarding.
- Effective policies and procedures are in place and updated annually and the school ensures all staff comply with the CIT behaviour Code of Conduct for staff and volunteers.
- The school contributes to inter-agency working in line with statutory guidance “Working Together to Safeguard Children” 2026 including providing a coordinated offer of Family/ Early Help for children who require this.

3.6. The Headteacher

The Trust expects that the Headteacher of the school is responsible for ensuring safeguarding is effective.

KCSIE 2026 expects the headteacher to provide strategic and operational leadership for safeguarding, ensuring that policies, training, culture, safer recruitment, child protection procedures, online safety and multi-agency working are implemented effectively so that children are kept safe and their welfare is promoted

To do this they will ensure that they:

Lead a Strong Safeguarding Culture.

Create and foster a culture where all staff and volunteers feel able to raise concerns about poor or unsafe practice regarding children, and such concerns are addressed sensitively and effectively in a timely manner.

The Headteacher should promote a whole-school safeguarding culture where:

- Safeguarding is everyone's responsibility.
- Children's welfare is paramount.
- Staff understand that "it could happen here".
- Concerns are acted upon promptly and appropriately.
- Children feel safe, listened to and supported.

Ensure Effective Safeguarding Policies and Procedures.

All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails they can report these directly to Children's Social Care (Children and Family Specialist Services) or the Police.

The Headteacher should ensure that:

- Child protection and safeguarding policies are implemented effectively.
- Staff know and follow safeguarding procedures.
- Policies are reviewed and understood by staff.
- Systems for reporting, recording and escalating concerns are robust.

Support and Work Closely with the DSL - The Headteacher must ensure that:

- An appropriately trained Designated Safeguarding Lead (DSL) is appointed.
- The DSL has sufficient time, funding, training, resources and authority to carry out the role.
- Deputy DSLs are trained and available as required.
- Safeguarding concerns are managed effectively.

Ensure Staff Training and Awareness - The Headteacher should ensure that:

- All staff receive safeguarding and child protection training.
- Induction includes safeguarding procedures, behaviour code and whistleblowing arrangements.

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- Staff receive regular updates and understand emerging risks, including online harms and AI-enabled abuse.
- Staff understand their responsibilities under Part One of KCSIE.

Safer Recruitment - The Headteacher is responsible for ensuring:

- Appropriate pre-employment checks are carried out on school staff by the central team.
- The Single Central Record is maintained and is compliant.
- Recruitment processes comply with KCSIE requirements.
- Concerns about adults working with children are managed appropriately.

Manage Allegations and Low-Level Concerns - The Headteacher should:

- Act on allegations against staff in accordance with KCSIE.
- Promote a culture of openness and professional curiosity.
- Ensure low-level concerns are recorded and addressed.
- Work with the Local Authority Designated Officer (LADO) where required.

Promote Early Help and Multi-Agency Working - Headteachers should ensure that the school:

- Identifies emerging needs early.
- Engages with family help and early help services.
- Works effectively with social care, health, police and other agencies.
- Shares information appropriately to protect children.

Ensure Online Safety. KCSIE 2026 places continued emphasis on online safety. Headteachers should ensure:

- Online safety is embedded within safeguarding arrangements.
- Staff understand online risks, including AI-generated imagery, cybercrime, exploitation and harmful content.
- Appropriate filtering and monitoring systems are in place and effective.

Promote Safeguarding Through the Curriculum - The Headteacher should ensure that the curriculum clearly identifies where pupils are taught about:

- Healthy relationships.
- Online safety.
- Personal safety.
- Preventing exploitation, abuse and radicalisation.
- How to seek help when worried.

Support Children at Greater Risk - The Headteacher should ensure effective support for groups who may be more vulnerable, including:

- Children with SEND.
- Children in care (LAC/CiC) and previously looked-after children.
- Young carers.
- Children absent from education.

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- Those experiencing abuse, exploitation or mental health concerns.

Engage and comply with compliance, checking and monitoring processes required by the Trust and centre. This includes the following:

- The CIT Safeguarding Audit is completed and updated regularly so there is an up to date and accurate self-evaluation of the effectiveness of safeguarding in the school. This is shared with the LSB and the Trust DSL.
- Regular accurate reporting to the LSB in line with Trust expectations. This includes the data that governance needs to analyse according to statutory guidance i.e. data on restrictive interventions, anaphylaxis 'near misses', etc.
- Ensure the local authority Annual Safeguarding Return is completed and submitted within the deadline.

3.7. The Designated Safeguarding Lead (DSL)

All schools will have a named DSL and at least one deputy. Both will be trained to the same level – to ensure consistency of quality provision.

The DSL must be on the senior leadership team and the Headteacher must ensure the DSL has sufficient time, funding, training, resources and authority to carry out their duties.

Part 2 of this document will set out provision for DSL cover during school closure times.

Under KCSIE 2026, the Designated Safeguarding Lead (DSL) takes lead responsibility for safeguarding and child protection within the school. The detailed responsibilities are set out in Annex B: Role of the Designated Safeguarding.

A DSL's responsibilities in KCSIE 2026 can be distilled into six core functions:

Identify → Respond → Refer → Record → Support → Lead

The Trust expects the school's DSL to be the:

- Lead safeguarding professional.
- Expert adviser to leaders and governors.
- Coordinator of child protection processes.
- Link with external safeguarding agencies.
- Guardian of safeguarding records and practice.
- Driver of a strong safeguarding culture across the school.

The Trust defines DSL responsibilities as follows:

The Designated Safeguarding Lead (DSL) is responsible for leading and coordinating safeguarding and child protection within the school. The DSL ensures that safeguarding policies and procedures are implemented effectively, provides advice and support to staff, manages concerns and referrals about children at risk, works closely with external agencies, and promotes a culture where the welfare and wellbeing of all children are prioritised. The DSL also ensures that safeguarding training is up to date and that appropriate action is taken to protect children from harm.

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This is broken down as follows:

Managing Referrals

- Receive and triage all safeguarding reports and act appropriately as set out in KCSiE 2026.
- Refer cases of suspected abuse and neglect to children's social care.
- Support staff who make referrals.
- Refer cases to the Channel programme where there are concerns about radicalisation.
- Refer cases involving crimes to the police when appropriate.
- Refer children who may be victims of modern slavery or trafficking through the National Referral Mechanism where appropriate.
- Follow up referrals and ensure children receive appropriate support – escalating cases where necessary.

Working with Others - The DSL should:

- Act as a source of safeguarding expertise within the school.
- Liaise with the headteacher, governors and relevant agencies.
- Work closely with social workers and other professionals.
- Ensure the school contributes effectively to child protection conferences, family help processes, strategy discussions and multi-agency meetings.
- Support transition arrangements when pupils move schools.

Information Sharing and Child Protection Records - The DSL is responsible for keeping detailed, accurate and secure written records. This includes:

- Maintaining secure and accurate safeguarding and child protection records.
- Ensuring concerns, discussions, decisions and reasons for decisions are recorded.
- Ensuring that records are confidential, secure, and up to date, in a separate record for each child, including a clear and comprehensive summary, detailing how the concern was followed up and resolved, with a note of actions, decisions and the outcome.
- Ensuring files are transferred securely when a child moves school.
- Holding and sharing information appropriately in line with data protection legislation and safeguarding requirements.
- Ensuring safeguarding files are distinct from educational records where appropriate.

Raising Awareness - The DSL should ensure:

- Staff understand safeguarding and child protection policies.
- Staff know how to raise concerns.
- Parents are aware of the school's safeguarding responsibilities and policies.
- Safeguarding remains a visible priority across the school.

Training, Knowledge and Skills - The DSL must:

- Read, understand and follow all statutory guidance linked to safeguarding.
- Undertake appropriate DSL training as set out in the CIT 3 Year Pathway.
- Update their knowledge and skills regularly.
- Understand local safeguarding arrangements and thresholds.
- Be aware and keep updated of emerging safeguarding risks and national guidance.

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Have secure working knowledge of:

- early help and family help processes
- child protection procedures
- exploitation
- online safety
- children missing education
- mental health concerns
- child-on-child abuse
- harmful sexual behaviour
- contextual safeguarding
- special educational needs and disabilities (SEND).

Supporting Staff - The DSL should:

- Ensure all staff have completed the expected safeguarding training as set out in the CIT 3 Year Pathway.
- Maintain the training record/matrix.
- Advise and support staff on safeguarding concerns.
- Help staff understand when concerns require referral.
- Ensure safeguarding concerns are acted upon promptly.
- Promote a culture of professional curiosity.
- Assist staff in understanding risk and protective factors affecting children.

Understanding the Views of Children - The DSL should establish a listening culture to all children (including those who are known to be disproportionately impacted by different forms of harm and abuse e.g. LGBTQ+ pupils, disabled children or girls) and:

- Ensure that leaders know whether pupils feel safe in school – making sure the school has a mechanism for gathering pupil voice, especially those who have barriers to disclosure.
- Promote a child-centred approach.
- Ensure children know who they can speak to.
- Take account of children's wishes, feelings and lived experiences.
- Help children participate in safeguarding decisions affecting them where appropriate.

Online Safety Leadership - The DSL should take a strategic lead on online safety by:

- Understanding filtering and monitoring systems.
- Working with IT and school leaders to review online safeguarding arrangements.
- Ensuring staff understand online risks.
- Supporting the school's response to online abuse, exploitation, cybercrime, AI-generated imagery and other digital safeguarding concerns.
- Ensure the Online safety curriculum teaches pupils how to keep safe online.

Working with the Designated Teacher

The DSL must maintain data for children who have looked after status (LAC/CiC) and for children who have been involved in the care system. The designated safeguarding lead

will have details of the child's social worker and the name of the virtual school head (VSH) in the relevant authority that looks after the child.

They should ensure that appropriate staff have access to the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

3.8. The Deputy DSL

The DDSL support the DSL in all these responsibilities and will act for them in their absence. Therefore, they will be trained to the same level as the DSL to ensure they can competently carry out this role where necessary.

3.9. The Designated Teacher for LAC/CiC

Designated teachers have responsibility for promoting the educational achievement of children who are in local authority care, those who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Leaders in the school will be responsible for ensuring they have received the appropriate training to carry out their role effectively, following the CIT central policy for LAC/CiC pupils.

The Designated Teacher in conjunction with the DSL should:

- Maintain and analyse data for children who have looked after status and for children who have been involved in the care system.
- Establish and maintain good links with the Virtual School Heads (VSH) to promote the educational achievement of previously looked after children. The Trust requires all CIT schools to work with the VSH who should identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children. This should include Designated Safeguarding Leads, social workers, headteachers, governors, Special Educational Needs Co-ordinators, mental health leads, other local authority officers.
- Ensure they are working with VSH to support any pupils in a Kinship Care arrangement.

Non-statutory guidance on Promoting the education of children with a social worker and children in kinship care arrangements contains further information on the roles and responsibilities of Virtual School Heads.

4.1 Staff Conduct

Parents need to be confident that the environment they send their children to daily is safe and secure. Children also need to know that school is a protective environment where their health and wellbeing is a priority.

Following the [Guidance for Safer Working Practice for those Adults who work with children and young people](#) all staff in our CIT schools must ensure they:

- Take responsibility for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Work in an open and transparent way.
- Work with other colleagues, where possible, in situations open to question.
- Discuss and/or take advice from school management over any incident which may give rise to concern.
- Record any incidents or decisions made.
- Apply the same professional standards regardless of gender, sexuality, or disability.
- Comply with all confidentiality expectations (see para 11.7).
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

The Trust expects that CIT staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. (Para 11 KCSiE 2026).

This includes expectation of their conduct in line with our CIT values – Honesty and Integrity, Aspiration, Professionalism and Inclusivity.

4.2 Code of conduct

The Trust expects that all staff must receive, read and understand the CIT Code of Conduct on their induction into the organisation. All staff includes volunteers, governors, trustees and visitors

Everyone who visits or works on a CIT school site is expected to always adhere to the Trust's Code of Conduct.

The Code of Conduct sets out the professional standards, behaviours and responsibilities required to safeguard and promote the welfare of children. Failure to comply with the Code of Conduct may be addressed through the Trust's disciplinary procedures and, where appropriate, safeguarding processes.

4.3. Allegations Against Staff

All CIT staff and volunteers have a duty to report any concerns they have about adults who work/volunteer in any CIT school.

These Concerns will fall into one of 2 different categories:

1. Low level concerns
2. Concerns that have met the harm threshold.

4.4. Harm Threshold Concerns

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KCSiE 2026 defines the 'Harm Threshold' as being where it is alleged that anyone working in the school or a college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors has:

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

If the allegation is considered by school leaders to have met the Harm Threshold, including if there is a transferable risk (i.e. includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children) the following steps need to be taken:

- Any concerns about the conduct of another member of staff, must be reported to the Headteacher.
- If staff members have concerns about the Headteacher, these will be reported to the relevant Director of Education (D of E).
- The Head teacher or D of E will then consider if the concerns need to be reported to the LADO.
- Any concerns relating to the central team or CIT leadership should be reported to the Director of Safeguarding or the Safeguarding Trustee.
- Staff can find details of the contacts for these roles in the CIT Safeguarding Handbook.

All allegations about CIT staff will be processed following our central CIT Allegations policy: [Allegations-of-Abuse-Made-Against-Staff-Policy-Summer-2026.pdf](#)

4.5. Low-Level Concerns

The Trust is committed to creating a culture of openness and transparency in which all concerns about the conduct of adults working with children are identified, shared, and addressed promptly. Low-level concerns, (i.e. do not meet the 'Harm Threshold') no matter how small, that an adult's behaviour may be inconsistent with the Trust's Code of Conduct should be reported and managed in accordance with the Trust's Low-Level Concerns procedures to help safeguard children and maintain professional standards.

Please see Appendix 2 for the CIT Low Level Concern Policy.

4.6. Local Authority Designated Officer

The Local Authority Designated Officer (LADO) provides advice, guidance and oversight where there are concerns or allegations that an adult working with children may have harmed a child, committed an offence against a child, or behaved in a way that indicates they may pose a risk to children. The Trust will work with the LADO and follow local procedures to ensure all such concerns are managed appropriately and without delay.

4.7. Whistleblowing

Anyone worried about a child must continue to raise the concern until they have a reason not to be worried about the child anymore.

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The Trust encourages all staff, volunteers, and contractors to raise concerns about poor practice, safeguarding failures or behaviour that may place children at risk. Concerns can be reported without fear of reprisal and will be taken seriously, investigated appropriately, and managed in accordance with the Trust's Whistleblowing Policy and safeguarding procedures. [HR7-Whistleblowing-Policy-Summer-2026.pdf](#)

It is essential that our school expects good practice and professional conduct from ourselves, and others involved in the safeguarding of our children. Staff must be committed to providing a high standard of service and children cannot be expected to raise concerns in an environment where staff fail to do so.

The Trust requires all CIT staff to be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. They will follow the procedures for reporting low level concerns which are in our Code of Conduct and Disciplinary Policy and raise with the Head teacher and involve the LADO if required.

If a member of staff notices anything that gives them cause for concern, it is vital that this is raised. Acting upon staff concerns is fundamental to ensuring good practice and support for staff. Resolving issues must be viewed by all staff as a positive action and not a breach of trust between colleagues.

Our staff are encouraged to use the Whistleblowing policy as appropriate to raise or pass on concerns about any of the following:

- a) Poor standards of service
- b) Issues of bad practice
- c) The conduct of colleagues or managers
- d) Anything which is not in the best interest of the children or the school
- e) Anything which is illegal or unacceptable behaviour.

We will always listen to any concerns and try to resolve them but should staff feel unable to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled in the school, they can discuss the concern with either the relevant Director of Education – or the Safe@CIT central team.

Alternatively, anyone can use the NSPCC helpline [The NSPCC's 'What you can do to report abuse dedicated helpline](#) or call 0800 028 0285 – line is available from 8am-8pm, Mon-Fri and 9am-6pm at the weekends or email: help@NSPCC.org.uk

If there is a concern from within school about how a safeguarding concern is being handled or the school have concerns with the way other agencies are handling a safeguarding concern, then we will follow the relevant local authority escalation protocol. This allows us to open a dialogue with other professionals and resolve any issues in an open and honest approach and in the best interests of the child.

5.1. Safeguarding Procedures

The Trust expects that all CIT schools will follow statutory safeguarding guidance, Trust policies, and local safeguarding partnership procedures to ensure that all concerns about a child's welfare are identified, reported, and responded to promptly.

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All staff have a duty and responsibility to act on concerns immediately, record them accurately and share them with the DSL or DDSL to ensure children receive the right help at the right time.

11.2. Recognising Abuse and Neglect

The Trust expects that all staff and volunteers are aware that abuse, neglect and exploitation can occur in any family, setting or community.

Staff understand that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition, and that in most cases multiple issues will overlap with each other. Staff who regularly come into contact with children are aware of the DfE guidance [What to do if you're worried a child is being abused](#).

Staff must be trained to recognise and be vigilant to signs and indicators of potential harm, recognising that children may be abused by an adult or another child.

School leaders will ensure and check regularly that all staff, volunteers and LSB members are familiar with procedures to be followed. There will also be checks done regularly by leaders and the central team that they are being followed appropriately and effectively.

Concerns about a child's welfare must never be ignored and should be reported immediately to the DSL or DDSL in accordance with the Trust's safeguarding procedures.

Early identification and timely intervention are essential to protecting children and promoting their welfare.

Part 2 of this policy will set out school's individual arrangements for reporting concerns.

Appendix 3 is our CIT Signs of Abuse booklet that sets out signs and symptoms of abuse for staff to use and refer to.

11.2.1 Types of abuse

Physical Abuse

Physical abuse is a form of abuse that may involve:

- Hitting, shaking, throwing, poisoning, burning or scalding.
- Drowning, suffocating or otherwise causing physical harm to a child.
- Fabricating or inducing illness in a child.
- Physical harm may also occur when a parent or carer deliberately causes symptoms of illness in a child.

Emotional Abuse

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

It may involve:

- Conveying to a child that they are worthless, unloved or inadequate.
- Making children feel valued only insofar as they meet the needs of another person.
- Preventing a child from expressing their views.

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- Silencing, ridiculing or humiliating a child.
- Serious bullying, including cyberbullying.
- Causing children frequently to feel frightened or in danger.
- Exploitation or corruption of children.

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

Sexual Abuse

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

Activities may include:

- Physical contact, including assault by penetration or non-penetrative acts.
- Causing a child to engage in sexual activity.
- Looking at, or producing, sexual images.
- Encouraging children to behave in sexually inappropriate ways.
- Grooming a child in preparation for abuse, including online.
- Sexual abuse can be committed by adults or by other children.

Neglect

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

Neglect may involve:

- Failure to provide adequate food, clothing or shelter.
- Failure to protect a child from physical and emotional harm or danger.
- Inadequate supervision.
- Failure to ensure access to appropriate medical care or treatment.
- Unresponsiveness to a child's basic emotional needs.
- Neglect can also occur during pregnancy through maternal substance misuse.

Signs and symptoms of abuse and what staff need to look out for are listed in Appendix 3 of this policy – in our CIT Signs of Abuse Booklet. All staff should have access to this on the safeguarding noticeboard and given a copy on induction.

11.3. Responding to Concerns

All safeguarding concerns, however small they may appear, must be taken seriously and acted upon without delay. Staff are responsible for recognising and responding to concerns, recording information accurately, and reporting it promptly to the Designated Safeguarding Lead (DSL) or Deputy DSL. The Trust will ensure that concerns are assessed appropriately and that timely action is taken to safeguard and promote the welfare of children.

If a child makes a disclosure or there is a concern of harm, staff should:

- Listen carefully and remain calm.

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- Take the child seriously and reassure them that they have done the right thing by telling you.
- Allow the child to speak freely and do not interrupt or ask leading questions.
- Avoid investigating or seeking further evidence.
- Try not to express feelings or judgements regarding any person alleged to have harmed the child.
- Do not promise confidentiality; explain that information will need to be shared with people who can help keep them safe. Children need to know that staff may not be able to uphold confidentiality where there are concerns about their safety or someone else's.
- Reassure and support the child as far as possible.
- explain that only those who 'need to know' will be told
- Clarify only when necessary, using open questions such as "Tell me," "Explain," or "Describe."
- Record the disclosure accurately using the child's own words as soon as possible.
- Report the concern immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL in line with Trust procedures. The Trust advises within 15 minutes. All concerns must be reported before the member of staff goes home at the end of the day.
- Seek immediate support if there is a risk of significant harm or an emergency.
- The welfare of the child is paramount, and all disclosures must be treated sensitively, seriously and acted upon without delay.

Staff in schools must not:

- Promise confidentiality.
- Investigate the concern themselves.
- Ask leading questions intended to establish whether abuse has occurred.
- Confront alleged perpetrators.
- Delay reporting the disclosure.

11.4. Managing Disclosures

The DSL will triage and respond to all concerns logged on CPOMS appropriately and in a timely fashion.

Upon receiving a disclosure or concern of abuse, neglect, exploitation, or harm, the Designated Safeguarding Lead (DSL) will take prompt and appropriate action to safeguard the child and ensure that statutory responsibilities are met.

The DSL will:

- Ensure that the child has been listened to and that their views, wishes, and feelings have been considered.
- Review all available information, including the disclosure, observations, records, and any previous safeguarding concerns.
- Assess the nature and level of risk to the child, drawing upon professional judgement, safeguarding guidance, and, where appropriate, consultation with external agencies.

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- Take immediate action where a child is at risk of significant harm, including making referrals to Children's Social Care, the Police, or other relevant agencies without delay.
- Ensure that all concerns, discussions, decisions, actions taken, and the rationale for those actions are accurately recorded in the Trust's safeguarding recording system.
- Maintain appropriate confidentiality whilst ensuring that information is shared with relevant professionals on a need-to-know basis and in accordance with safeguarding and data protection legislation.
- Consider the needs and safety of other children who may be affected by the concern.
- Liaise effectively with parents and carers where it is safe and appropriate to do so, recognising that informing parents may not be appropriate where this could place a child at increased risk of harm or compromise an investigation. (this decision must be recorded).
- Monitor the child's welfare and ensure that appropriate support is provided within the setting.
- Contribute to and attend multi-agency meetings, strategy discussions, child protection conferences, and other safeguarding processes as required.
- Escalate concerns where they believe a child is not receiving an appropriate response or sufficient protection from safeguarding agencies.
- Ensure that all staff involved are informed, supported, and clear about any actions they are required to take.

The DSL's actions will be guided by the principles of safeguarding, with the child's welfare always being paramount. Decisions will be made in accordance with current statutory guidance, including *Keeping Children Safe in Education*, *Working Together to Safeguard Children*, and local safeguarding partnership procedures.

The welfare of the child will always remain paramount, and information will be shared on a need-to-know basis in line with safeguarding legislation, statutory guidance, and data protection requirements.

Wherever possible, DSLs will ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide. Child Protection processes will operate with the best interests of the child at their core.

11.5. Recording and Reporting Concerns

The Trust expects that all staff and volunteers including visitors in school know and understand how to report a concern according to the school's own procedures.

In all CIT schools, school leaders ensure that all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing on the electronic MIS system (CPOMS). We maintain the position – "If it is not written down, it did not happen".

Accurate records will be made as soon as practicable ideally within 15 minutes of disclosure, and as soon as actions have been taken. All recording of concern or subsequent actions taken that day must be recorded before staff leave at the end of the school day.

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All records will state who is providing the information, the date and time, information will be recorded in the child's words where possible, and a note made of the location and description of any injuries seen.

All reports are expected to demonstrate accurate fact not opinion or hypothesis. All records of reported concerns are followed up by the appropriate person and clearly show what action is being taken because of the concern and the outcomes of this action.

The DSL ensures that the method for other members of staff or volunteers passing on concerns or information is always adhered to as consistency is paramount in ensuring that nothing gets missed.

The DSL is responsible for deciding at what point these records should be shared with other agencies (in accordance with the Data Protection Act 2018 and GDPR principles).

The Trust expects that records must include:

- A clear and comprehensive summary of the concern – factual not opinion.
- Details of how the concern was followed up and resolved including dates and times to show how quickly the team responded.
- A note of any and every action taken, all correspondence, decisions reached and the outcome. This includes any pupil check-ins after the concern/disclosure.
- Paperwork from external agency meetings with outcomes
- A recorded rationale for decisions made, for example referral to EH, duty desk or not.
- Recorded discussions of the review of impact of actions taken that have been discussed at senior leader meetings.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead.

11.6. Information Sharing

The Trust recognises that effective safeguarding depends upon the timely, accurate and lawful sharing of information. Staff must not allow concerns about confidentiality or data protection to prevent the sharing of information where it is necessary to safeguard or promote the welfare of a child.

All information sharing will be undertaken in accordance with the Data Protection Act 2018, UK GDPR, relevant local safeguarding arrangements, and *Keeping Children Safe in Education 2026*.

The Trust will ensure that relevant information is shared with appropriate professionals, agencies, and authorities where there are concerns about a child's safety, wellbeing or welfare, including through multi-agency safeguarding and Family Help processes where appropriate. Decisions to share information will be proportionate, recorded, and focused on the best interests of the child.

Where possible, consent will be sought; however, consent is not required where there is a lawful basis to share information to protect a child from harm or where seeking consent would place a child at increased risk.

The DSL will take lead responsibility for ensuring that information is shared appropriately, securely and in a timely manner with relevant safeguarding partners, children's social

care, the police and other agencies as required. All staff are expected to understand their responsibilities regarding information sharing and must promptly report any safeguarding concerns in line with Trust procedures.

11.7. Confidentiality

The Trust recognises that safeguarding information is highly sensitive and must be handled in a confidential, proportionate and secure manner.

Information will be shared on a strict need-to-know basis with those who require it to safeguard and promote the welfare of a child.

In line with *Keeping Children Safe in Education* and *Working Together to Safeguard Children*, timely and appropriate information sharing is essential to effective safeguarding and should not be delayed due to concerns about confidentiality, data protection or consent where a child may be at risk of harm.

The safety, welfare and best interests of the child will always be the Trust's paramount consideration.

Staff must not promise confidentiality to a child or family where safeguarding concerns are identified.

Any information relating to safeguarding concerns will be shared appropriately, lawfully and proportionately, in accordance with statutory guidance, data protection legislation and the best interests of the child.

All decisions to share, or not share, information will be recorded and managed in accordance with data protection legislation, Trust procedures and relevant safeguarding guidance.

12.1. Working with Parents and Carers

The Trust recognises that in all our schools the child's welfare is paramount, and that good child protection and safeguarding practice and outcomes rely on a positive, open, and honest working partnership with parents. All leaders, LSB and staff in school are committed to working with parents positively, openly, and honestly.

We expect that schools will always aim to ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to protect a child. We make safeguarding information available in a variety of formats, e.g., for families with English as an additional language (EAL) etc.

We aim for all Trust and school policies and systems to be in place and well promoted, easily understood and easily accessible for not only children but also worried parents to confidently report, any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Whilst we expect that schools may, on a rare occasion, need to make referrals without consultation with parents and carers, schools will make every effort to maintain a positive working relationship with them whilst fulfilling their duties to protect any child.

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All safeguarding policies and procedures including the complaints and whistleblowing policies are available for parents and carers on the Trust and school websites.

Staff who have responsibility for safeguarding in school and how to contact them are shown on every school website as well as on posters in the entrance of the school.

12.2. School responsibility. Our CIT schools will:

- Ensure that if parents/carers have any concerns about their child's welfare, they can raise this with the child's teachers or with the Head teacher.
- Make sure that if a parent feels that their concerns are not being addressed, they can follow the school complaints procedure which is outlined in the school complaints policy found on the website. Any serious safeguarding concerns can be reported directly to the relevant local authority Customer Services centre – as anyone can report a concern directly. The numbers for this service are on the contacts page of Part 2 of this policy.
- Share information with parents and carers about where to get help and support so they can protect their children at home. This includes helping with online safety understanding.
- Undertake appropriate discussion with parents/carers and seek necessary consent prior to involvement of Children & Family Services (Children's Social Care) or another agency, unless to do so would place the child at risk of harm or compromise an investigation.
- Maintain regular contact with parents in the event of any remote learning, communications should be used to reinforce the importance of children being safe online including what systems school use to filter and monitor online use. We are aware it is important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school their child is going to be interacting with online.
- Make every effort to engage and work with parents in planning for vulnerable children for instance through drawing up individual behaviour plans for more vulnerable children to ensure positive and proactive behaviour support, to reduce the occurrence of challenging behaviour and the need to use reasonable force.
- Prioritise the need to preserve the privacy, dignity and right to confidentiality of the child and parents. School leaders will determine which members of staff need to know personal information and what they need to know for the purpose of supporting and protecting the child.

13. Family Help and Early Help.

The Trust recognises that providing Early Help is more effective in promoting the welfare of children than reacting later when concerns have escalated. The Trust expects that all schools will work proactively with children, families, and partner agencies to identify emerging needs and provide support at the earliest opportunity.

Staff will report concerns to the DSL who will consider the need for Family Help, Family Help services, or referral to statutory agencies in accordance with local safeguarding

arrangements, following *Working Together to Safeguard Children*, and *Keeping Children Safe in Education 2026*.

The DSL in all schools will understand and follow their own local authority Family Help arrangements.

Early Help is a process within Family Help that identifies the provision of support to a child, young person, or family as soon as a problem emerges, at any point in a child's life, to improve outcomes and prevent concerns from escalating to the point where statutory intervention becomes necessary. Early Help may be provided through universal services, community-based Early Help, or targeted Family Help services and should be considered whenever a child has additional needs that are not being met by universal provision alone.

KCSIE 2026 emphasises that any child may benefit from support before statutory intervention, and that staff should be alert to children who may need additional help due to factors such as SEND, disability, mental health needs, young caring responsibilities, pregnancy, vulnerability to exploitation, or emerging harmful behaviours.

The Trust expects that where a child does not require statutory social care intervention, the DSL will coordinate liaison with other agencies and support the completion of a Family Help assessment or other Early Help arrangements, ensuring the child's circumstances are reviewed and escalated if concerns increase.

The Trust expects CIT schools to:

- Be alert to children who may benefit from Family Help.
- Have clear procedures for identifying emerging needs and making referrals for support.
- Ensure staff know how to raise concerns with the DSL.
- Work in partnership with children, families and external agencies.
- Contribute information to Family Help assessments when requested.
- Monitor the impact of support and escalate concerns where a child's needs are not being met or risks increase.

Part 2 of this policy will set out a school's individual provision/procedure for Family and Early Help.

14. Child Protection Referrals

The Trust recognises that where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to Children's Social Care must be made without delay. The welfare of the child is paramount and concerns about a child must never be allowed to drift or remain unresolved.

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The DSL or DDSL acting in their absence, will make decisions regarding child protection referrals in accordance with local safeguarding partnership procedures and statutory guidance. This includes referrals where there are concerns relating to abuse, neglect, exploitation, serious violence, harmful sexual behaviour, domestic abuse, or any other circumstance where a child may be at risk of significant harm.

When a referral is made, the DSL will:

- Gather and consider all relevant information and safeguarding records.
- Make a referral to Children's Social Care promptly where threshold criteria are met.
- Contact the Police and/or emergency services immediately where a child is believed to be at imminent risk of harm.
- Ensure that all decisions, actions taken, and the rationale for those decisions are clearly recorded.
- Liaise with Children's Social Care, the Police, health professionals, and other relevant agencies as required.
- Inform parents/carers of the referral unless doing so would place the child at increased risk of harm, prejudice a criminal investigation, or otherwise be contrary to the child's welfare.
- Ensure that referrals are followed up where a response is not received within expected timescales.
- Escalate concerns through appropriate professional challenge procedures where there is disagreement regarding thresholds, decision-making, or protective actions.
- Continue to monitor and support the child whilst statutory agencies undertake their assessment and intervention.
- Record all actions, follow up activity and events as part of an accurate and robust chronology.

14.2 Reporting to Social Care

Any member of staff may make a referral directly to Children's Social Care if they believe a child is at immediate risk of harm or if, for any reason, they feel that appropriate action has not been taken following the reporting of a concern. In such circumstances, staff must inform the DSL as soon as possible, unless doing so would place the child at further risk.

14.3 Reporting to the Police

The Trust recognises that some safeguarding concerns may constitute a criminal offence or place a child at immediate risk of harm. Where appropriate, the DSL will make a referral to the Police and work in partnership with law enforcement agencies to protect children and support investigations.

In circumstances where there is an immediate risk to a child's safety, any member of staff may contact the Police directly and must inform the DSL as soon as possible thereafter.

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All actions, decisions, and communications with the Police will be recorded and managed in accordance with statutory safeguarding guidance and local safeguarding procedures.

14.4 Multi-Agency Working

The Trust recognises that safeguarding children is a shared responsibility and is most effective when agencies work together. The Trust will work collaboratively with Children's Social Care, the Police, Health Services, Education providers, and other relevant partners to identify, assess, and respond to safeguarding concerns. The DSL will contribute to assessments, share information appropriately, attend multi-agency meetings, and support coordinated plans to promote the safety, welfare, and best interests of children always.

The Trust expects that all CIT schools will work collaboratively with safeguarding partners and will contribute to statutory assessments, strategy discussions, child protection enquiries, child protection conferences, core groups, and other multi-agency safeguarding arrangements to promote the safety and welfare of children.

15. Children Potentially at Greater Risk

The Trust recognises that all children have the right to protection from abuse, neglect, exploitation, and harm. However, some children may face additional barriers to safeguarding or may be at an increased risk of abuse, neglect, or poor outcomes due to their individual circumstances, vulnerabilities, experiences, or protected characteristics. Staff should be particularly vigilant in identifying concerns, exercising professional curiosity, and providing appropriate support for these children.

Children who may be at greater risk include, but are not limited to, those who:

- Have special educational needs and/or disabilities (SEND).
- Have mental health needs or emotional wellbeing difficulties.
- Are disabled or have complex health needs.
- Are young carers.
- Are persistently absent from education or have been excluded from school.
- Are children in need, subject to a child protection plan, or previously subject to a child protection plan.
- Are looked after children (LAC) or previously looked after children (PLAC).
- Have experienced abuse, neglect, domestic abuse, trauma, bereavement, parental conflict, substance misuse, or parental mental ill health.
- Are living in challenging family circumstances, including poverty, homelessness, or unstable housing.
- Are privately fostered.
- Are vulnerable to child criminal exploitation (CCE), child sexual exploitation (CSE), county lines activity, serious violence, or gang involvement.
- Are at risk of radicalisation or extremism.
- Are at risk of harmful sexual behaviour, peer-on-peer abuse, online abuse, or technology-assisted harm.

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- Are vulnerable to honour-based abuse, including forced marriage or female genital mutilation (FGM).
- Are lesbian, gay, bisexual, transgender or questioning (LGBTQ+) and may face additional vulnerability due to prejudice, discrimination, isolation, or targeted abuse.
- Have experienced discrimination, hate incidents, or prejudice related to race, ethnicity, religion, disability, gender, gender identity, or sexual orientation.
- Have a social worker or require support from multiple agencies.
- Have communication difficulties or barriers which may affect their ability to seek help or disclose concerns.
- Are missing from home, education, or care.
- Are migrants, asylum seekers, refugees, or unaccompanied asylum-seeking children.

The Trust recognises that vulnerability is not static and that children may experience multiple and intersecting risks. Staff should be aware that additional vulnerabilities can make it more difficult for a child to recognise abuse, communicate concerns, or access support. Safeguarding responses must therefore be child-centred, inclusive, and tailored to the individual needs of each child.

The DSL will ensure that children identified as being at greater risk receive appropriate support, monitoring, and intervention, and that concerns are responded to promptly through Early Help, Family Help, or statutory safeguarding processes where required

16.1 Records, Monitoring and Transfer

The Trust expects that all schools will maintain accurate, confidential, and secure safeguarding records for all children in accordance with statutory guidance and data protection legislation.

Safeguarding records will be kept separately from the main pupil file, with access restricted to those who have a legitimate safeguarding need. When a child transfers to another school or educational setting, the DSL will ensure that safeguarding records are transferred securely and promptly to the receiving setting and that receipt is confirmed, in line with *Keeping Children Safe in Education 2026*.

16.2. Records of a Child's Information

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

- Names, contact details and relationship to the child of any persons with whom the child normally lives.
- Names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above). We need to know that if the person(s) with parental responsibility is unable to collect their child, there is someone known to us who can collect the child and keep them safe until either the person(s) with parental responsibility is available or a more suitable arrangement is made. We need more than one emergency contact and must have at least two, so we have additional options to contact a responsible adult when there is a welfare and/or safeguarding concern.

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- Any relevant court order in place including those which affect any person's access to the child (e.g., Residence Order, Contact Order, Care Order, Injunctions etc.)
- if the child is or has been subject to a Child Protection Plan
- if the child is or has been subject to an Early Help Assessment (EHA) or Child in Need (CIN) processes
- if the child is a Looked After Child (LAC-CiC) or previously looked after
- name and contact details of the child's GP and VSH
- any other factors which may impact on the safety and welfare of the child.
- Any medical condition or medication that a child is on – in case of emergency.
- All information linked to allergies or asthma – in line with the Trust and school policies.

The school will collate, store, and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting data protection and safeguarding requirements. Schools need to make sure this information is accurate. Schools must proactively encourage parents to keep them informed of any changes to the basic contact information that is held at any time.

School will check information for all children at least on an annual basis.

16.3 Records of concerns

The Trust expects the consistent and accurate recording of concerns across all CIT schools. The expectations are as follows:

- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.
- Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion, and hypothesis.
- All records will state who is providing the information, the date and time, information will be recorded in the child's words where possible, and a note made about the location and description of any injuries seen.
- The DSL ensures that the method for other members of staff or volunteers passing on concerns or information is always adhered to as consistency is paramount in ensuring that nothing gets missed.
- All records of concerns are followed up and clearly show what action is being taken because of the concern and the outcomes of this action.
- All staff are clear about the need to record, and report concerns about a child or children within the school.

The DSL is responsible for such records and for deciding at what point these records should be shared with other agencies (in accordance with the Data Protection Act 2018 and GDPR principles).

16.4 Records relating to actual or alleged abuse or neglect

These are required to be stored apart from normal pupil or staff records and must be stored securely. Where information is stored in a separate place i.e. on a child's records there will be markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know. The Trust expects all CIT schools to use CPOMS as their online MIS to make sure this is the case.

Child protection records are stored securely on CPOMS, with access restricted to safeguarding information confined to specific staff, e.g. the DSL, DDSL and the Headteacher.

Child protection records and chronologies on CPOMS are reviewed regularly by school leaders and by members of the central leadership team (including the Directors of Education and the Director of Safeguarding and the Safe@CIT central team) to check whether the management of records is effective and robust and whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon and all actions taken are clearly indicated.

10. Transferring records

Leaders will follow the file transfer guidance contained in KCSiE 2026 and ensure when a child moves school/education provision their child protection/confidential file is sent securely to their new educational setting when the child starts/ leaves the school within 5 days for an in-year transfer or within 5 days after the start of a new term.

In accordance with KCSiE 2026 we will maintain information on cohorts of children who have been open to social care, have had a social worker or who are closed to social care and may have returned to the family home. This information will only be considered for sharing 'if appropriate' with the new school or provider in advance of the child leaving to allow for the new school to continue supporting the children who have had a social worker or been victims of abuse, including those who are currently receiving support through the 'Channel' programme.

Should a child subject to social care involvement transfer schools, college, or education provider schools will ensure the child's child protection or confidential file move is transferred within 5 days.

Safeguarding records will be transferred separately from other records.

If the school receiving the records does not have CPOMS for electronic transfer – the best practice is to pass these directly to a DSL in the receiving school with any necessary discussion or explanation and to obtain a signed and dated record of the transfer.

Where a child needs specific ongoing support, relevant information will be transferred prior to the child arriving at their new school. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead and a photocopy kept until receipt is confirmed.

If files or CPOMS chronologies are requested by other agencies e.g. Police, are copied – DO NOT pass on any original files.

The full child record is transferred to the next school unless there are any records with a short retention period. It is important that full information is transferred to ensure a vital piece of information is not missing that could contribute at a later stage.

We do not keep any copies of records except where there is an on-going legal action. Once records are transferred, they are the custody and responsibility of the new school.

A child's last school is responsible for retaining the main child record until they reach the age of 25 years. These files are stored securely. Any record relating to child protection concerns is placed on the main child file, in a sealed envelope and then retained for the same period as the child file (DOB + 25 years).

11. Alternative Provision (AP)

The Trust recognises the definition of AP is as follows (KCSiE 2026):

Education arranged for children of compulsory school age who, because of exclusion, illness or other reasons, would not otherwise receive suitable education; alternative provision can also be used by schools for children on a suspension (fixed period exclusion); and for children being directed by schools to off-site provision to receive education intended to improve their behaviour.

Where a pupil attends AP, whether on a temporary, part-time or full-time basis, the Trust expects that schools understand that they remain responsible for ensuring that appropriate safeguarding arrangements are in place and that the pupil's welfare is effectively monitored.

The Trust requires that schools seek assurance that APs have effective safeguarding policies, safer recruitment practices, staff training and child protection procedures in place, and expects all schools to undertake all appropriate checks before the child attends the AP. This is to ensure clear information-sharing arrangements are established and then maintain regular communication with the alternative provider regarding attendance, behaviour, wellbeing and any safeguarding concerns.

Pupils who attend AP may often have complex needs. It is important that school leaders and DSLs ensure pupils are fully always supported, and the alternative setting is aware of any additional risks of harm that they may be vulnerable to. Information sharing for pupils who receive education provision outside of a mainstream setting is vital to support them and ensure the learning environment where they are placed has all necessary information about them before they access the provision. Working Together principles are key to keeping the pupils safe and understanding the vulnerabilities needing to be supported. This should include up to date contact details for the professionals working with the pupils and family.

Throughout the placement the DSL will continue to work closely with the provider and other relevant agencies to ensure safeguarding concerns are identified, recorded and acted upon promptly as well as continuing to monitor the quality and impact of the placement to ensure that the pupil remains safe and their educational needs are met.

The Headteacher and DSL will ensure that the school and the AP provider both follow the 2025 statutory guidance [Arranging Alternative Provision - guide for LAs and schools](#)

The school should always know where the child is during school hours. This includes our records of the actual address of the commissioned alternative provider and any subcontracted provision or satellite sites the child may attend.

When a child is attending an alternative provision school, there must be arrangements in place whereby all absences are reported by the AP to the school as early as possible and followed up promptly, particularly unexpected, and unexplained absences.

Schools need to regularly review AP placements. Reviews should be frequent enough to assure that the provision is achieving its objectives, that the child is regularly attending and that the placement continues to be safe and meets the child's needs.

All CIT schools will ensure that a member of their safeguarding team visits all active APs at least termly to check the provision is still appropriate and meeting the pupils need.

School leaders should regularly check in with pupils to make sure they get the opportunity to express any concerns about their experience of the AP. These must be recorded and acted on.

Where any safeguarding concerns arise, the placement should be immediately reviewed and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

12.1. Attendance and Safeguarding

The Trust recognises the strong links between attendance, absence, and safeguarding. Poor attendance, persistent absence, and children missing education can be indicators of abuse, neglect, exploitation, mental health concerns, or other safeguarding risks. The Trust will monitor attendance closely, identify patterns of concern, and take timely action to understand and address barriers to attendance. Safeguarding concerns identified through absence or non-attendance will be referred to the DSL and, where appropriate, addressed through Early Help, Family Help, or referral to statutory agencies to ensure children are safe and receive the support they need.

12.2 Attendance and vulnerable pupils

Some pupils find it harder than others to attend school and therefore at all stages of improving attendance, the Trust expects all CIT schools to work in partnership with pupils and parents collaboratively to remove any barriers to attendance by building strong and trusting relationships and working together to put the right support in place.

For the most vulnerable pupils, regular attendance is also an important protective factor and the best opportunity for needs to be identified and support provided. Research has shown associations between regular absence from school and a number of extra-familial harms.

12.3 Children Absent from Education

The Trust recognises that children who are absent from education, particularly those who are persistently absent, severely absent or whose attendance patterns change suddenly, may be at increased risk of abuse, neglect, exploitation, mental health difficulties, child

criminal exploitation, child sexual exploitation, domestic abuse, radicalisation or other safeguarding concerns.

All CIT schools are expected to have robust attendance policies and procedures that allow leaders to monitor all absence concerns closely and ensure they are responded to in a timely and proportionate manner. In all CIT schools the safeguarding and attendance teams will liaise regularly to track and monitor pupils who are persistently absent from school or whose attendance pattern changes.

Leaders must ensure that all staff are part of the school's robust day to day processes to track and follow up absence and poor punctuality, that support leaders to spot trends and take quick action. All CIT staff will remain alert to patterns of absence that may indicate a safeguarding concern and will report concerns to the DSL in accordance with school procedures.

The Trust expects schools will work in partnership with families, local authorities and other agencies to identify and address barriers to attendance and ensure that children receive the support they need to remain safe and engaged in education.

12.4. Children Missing Education

A child missing education (CME) is a child of compulsory school age who is not registered at a school and is not receiving suitable full-time education otherwise than at a school. Children missing education are recognised as being at significant risk of underachieving, becoming victims of harm, exploitation, radicalisation, child criminal or sexual exploitation, or becoming involved in offending behaviour. The Trust will take all reasonable steps to identify, monitor, and support children who are missing education and will work closely with the local authority and partner agencies to safeguard their welfare

The Trust recognises that children missing education are at increased risk of abuse, neglect, exploitation, and poor outcomes. All staff will be alert to signs that a child may be missing from education and will follow the Trust's attendance and safeguarding procedures to identify, investigate, and respond to concerns promptly. The Trust will work with parents, carers, the local authority, and partner agencies to locate and support children who are missing education, ensuring that appropriate safeguarding action is taken where there are concerns for a child's welfare.

Where reasonably possible, there is an expectation for all CIT schools to hold more than one emergency contact number for each pupil so we can more easily and quickly contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

Our school leaders will comply with the statutory guidance on Attendance - [Working together to improve school attendance: July 2026](#).

13 Elective Home Education

Elective home education (EHE) and special educational provision otherwise than at school arranged under section 61 of the Children and Families Act 2014 (EOTAS) are not a form of alternative provision. EHE is a term used to describe a choice by parents to provide

education for their children at home (or elsewhere) instead of sending them to school full-time.

The Trust requires schools should not seek to persuade parents to educate their children at home as a way of avoiding an exclusion or because the child has a poor attendance record.

In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, CIT requires all schools to inform the LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the Headteacher and DSL will work together to coordinate a meeting with parents/carers where possible.

Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

The leaders who manage this transfer from school to EHE will be familiar with the DfE guidance for local authorities on Elective home education sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. [Elective home education: departmental guidance for local authorities](#)

14. Mental Health and Wellbeing

The Trust recognises that positive mental health and wellbeing are fundamental to children's safety, learning, and development.

The Trust understands that mental health concerns can, in some circumstances, be an indicator that a child has experienced or is at risk of abuse, neglect, exploitation, or other safeguarding concerns.

Schools must ensure that only appropriately trained professionals should attempt to diagnose mental health conditions; however, all staff should be alert to changes in a child's behaviour, presentation, attendance, progress, or emotional wellbeing that may indicate a need for support or safeguarding intervention.

These need to be reported to the DSL.

The Trust will promote a whole-school approach to mental health and wellbeing, provide appropriate support for pupils, and work with families and partner agencies to ensure that children receive the help they need at the earliest opportunity.

15.1. Online Safety

The Trust recognises that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse online as well as face to face. It is essential that children are safeguarded from potentially harmful and inappropriate online material.

All pupils in all CIT schools must have high quality, age and stage and ability appropriate curriculum provision that teaches them how to keep safe online.

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Headteachers in all CIT schools are responsible for ensuring staff understand their roles in relation to online safety and will act promptly on any concerns identified through monitoring processes, in accordance with *Keeping Children Safe in Education 2026*. They will also be responsible for monitoring effectiveness of both filtering and monitoring, reporting breaches and following up any concerns appropriately that have breached the security.

We aim for staff to be trained to be aware to respond to incidents which may involve one or more of the four areas of risk – content, contact, conduct and commerce.

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

Online safety is a consideration running through the planning and implementation of all relevant policies and procedures. Staff will always respond if informed that children have been involved in sharing indecent images. The DfE guidance “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (Dec 2020) will be used to guide the school's response on a case-by-case basis.

The key points for staff and volunteers (not including the DSL) being: -

- Report immediately to the DSL
- Do not view, copy, print, share, store or save the imagery, or ask a child to share or download.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it. Leave this for the DSL if needed.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

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The LSB will check as part of their assurances to the Trust Board that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

15.2. Filtering and Monitoring

The Trust recognises its responsibility to provide a safe online environment for all pupils. The Trust will ensure that appropriate filtering and monitoring systems are in place in all CIT schools to protect children from accessing harmful or inappropriate content and to identify potential safeguarding concerns. Filtering and monitoring arrangements will be effective, proportionate, regularly reviewed, and aligned to the Trust's safeguarding responsibilities, technology use, and risk profile.

The Headteacher supported by the ICT lead at the Trust is responsible for ensuring the school meets the government standards for filtering and monitoring digital content and access: [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#) and [Appropriate Filtering and Monitoring - UK Safer Internet Centre.](#)

In CIT schools the DSL takes lead responsibility for safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place.

The effectiveness of filtering and monitoring systems will be formally reviewed and recorded at least annually.

15.3. Mobile phones

In accordance with *Keeping Children Safe in Education (KCSIE) 2026* and the Department for Education's statutory guidance on mobile phones in schools, the Trust is committed to maintaining safe, respectful and mobile phone-free learning environments that promote the welfare, safeguarding and educational achievement of all pupils. CIT schools should be mobile phone-free by default, with any exceptions subject to clear risk assessment and local procedures as set out in the Trust Mobile Phone Policy.

The use of mobile phones and other smart devices by pupils during the school day is prohibited except where explicitly authorised by the school for safeguarding, medical or educational purposes.

Misuse of mobile devices, including cyberbullying, the creation or sharing of inappropriate images, online harassment, unauthorised filming or recording, and access to harmful content, will be treated as a safeguarding concern.

15.4. Curriculum Provision

The Trust will receive assurances from each school LSB that pupils are taught about online safety, through the delivery of a comprehensive, age-appropriate online safety curriculum that equips pupils with the knowledge, skills and resilience to navigate the digital world safely and responsibly.

In line with KCSIE 2026, online safety education must be embedded across the curriculum and include teaching on safe online behaviour, healthy relationships, cyberbullying, privacy, misinformation, digital citizenship, and the risks associated with online content, contact, conduct and commerce.

The Trust expects that all CIT schools work in partnership with parents, carers and external agencies to promote a culture of online safety and safeguard children in both school and wider digital environments.

The contextual school provision will be set out in Part 2 of this policy.

15.5 AI risks including AI Generated images.

The Trust recognises that artificial intelligence (AI) technologies, including AI-generated images, are increasingly accessible to children and young people. In line with KCSIE 2026, CIT schools will ensure that pupils are taught at an age-appropriate level about the safe, ethical and responsible use of emerging technologies as part of their online safety education.

Any use of AI-generated content that causes harm, facilitates bullying, harassment, discrimination, misinformation, impersonation, exploitation, or the creation or sharing of inappropriate images will be treated as a safeguarding concern and managed in accordance with this policy in conjunction with the school's Behaviour Policy.

The Trust expects that all CIT schools will take appropriate measures to educate pupils, support staff awareness, and respond to risks associated with AI and other emerging technologies.

16.1. Support to pupils and school staff

16.2. Support given to vulnerable pupils

The Trust is committed to identifying and supporting pupils who may be vulnerable to abuse, neglect, exploitation, poor mental health, discrimination or other safeguarding risks.

We recognise that vulnerability may arise from a child's individual needs, family circumstances, lived experiences or social and environmental factors, and that some pupils may require additional support to achieve positive outcomes.

The Trust expects that schools adopt a child-centred approach, ensuring that vulnerable pupils are listened to, their views are considered, and appropriate support is provided at the earliest opportunity. This may include pastoral support, early help, mentoring,

attendance interventions, mental health support, reasonable adjustments for pupils with SEND, and referrals to external agencies where appropriate.

School staff will work collaboratively with parents, carers and partner agencies to identify barriers to learning and wellbeing, promote resilience, and help pupils remain safe, engaged and able to thrive. The DSL will oversee support for vulnerable pupils, ensuring that concerns are monitored, reviewed and responded to in a timely and proportionate manner.

16.3. Child on Child Abuse – see Appendix 1

The Trust recognises that children can abuse other children and that all child-on-child abuse is unacceptable and will be taken seriously. All reports of child-on-child abuse will be considered as a safeguarding concern.

This may include, but is not limited to, bullying (including prejudice-based and cyberbullying), physical abuse, sexual violence, sexual harassment, harmful sexual behaviour, abuse within intimate personal relationships, initiation or hazing-type violence, upskirting and consensual or non-consensual sharing of nude or semi-nude images and videos.

All schools within the Trust will maintain a culture where abuse is never tolerated, never dismissed as banter, part of growing up or horseplay, and where all concerns are reported, recorded and responded to promptly.

Any incidents of child-on-child abuse will be recorded and reported as a safeguarding concern and managed using a victim-centred approach, with appropriate support and safeguarding measures provided for all children involved, and referrals made to external agencies where required.

The Trust will ensure that staff receive appropriate training, that pupils are educated about respectful relationships and acceptable behaviours, and that effective action is taken to prevent, identify and address child-on-child abuse.

Further information about child-on-child abuse is set out in Appendix 1 of this policy.

16.4. Prejudice and Discriminatory Harm

All CIT staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination.

Such experiences may affect a child's welfare, well-being and mental health. Also, their sense of safety and willingness to seek help.

The Trust expects all staff to remain vigilant to the signs and impact of prejudice-based harm. Concerns will not be treated as behaviour – they will be reported in accordance with the school's safeguarding procedures.

16.5 Harassment

The Trust recognises that harassment can have a significant impact on a child's safety, wellbeing, dignity and educational experience.

Harassment may be verbal, non-verbal, physical, sexual, discriminatory or online in nature and can be directed towards an individual or group.

It may include unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment can occur between children, between adults and children, or through online platforms and social media.

The Trust expects that CIT schools do not tolerate any form of harassment and will take all reports and concerns seriously.

School staff must report any concerns promptly to the DSL using the school agreed procedure, as Harassment is considered a safeguarding issue.

Incidents will be investigated and addressed in accordance with the school's own safeguarding, behaviour and anti-bullying procedures.

School leaders must ensure that the appropriate support will be provided to those affected, and the Trust then expects that schools will work proactively through its curriculum, policies and culture to promote respect, inclusion and positive relationships for all members of the school community.

All work done following a report or disclosure of harassment will be recorded on the chronology and leaders will assess and analyse the impact of any actions taken.

16.5. Domestic Abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are personally connected. Children are recognised as victims of domestic abuse where they see, hear, or experience the effects of abuse.

Domestic abuse includes but is not limited to:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic (financial) abuse
- Psychological, emotional or other abuse

Domestic abuse is a serious safeguarding issue that can have a significant impact on the physical, emotional, psychological, and educational wellbeing of children and adults.

We acknowledge that domestic abuse can affect anyone, regardless of age, gender, ethnicity, disability, sexual orientation, religion, or socio-economic background.

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Early identification, intervention, and support are essential in reducing the impact of domestic abuse.

Effective safeguarding requires a coordinated multi-agency approach.

All concerns relating to domestic abuse will be taken seriously and responded to promptly. They must be reported immediately in line with this policy, in accordance with KCSIE 2026, local safeguarding partnership procedures, and statutory safeguarding guidance.

Where staff in school have a concern that an adult working/volunteering in a school is a victim of domestic abuse, then they should refer to the CIT central policy - [SG1-Domestic-Abuse-Policy-Spring-2026.pdf](#)

16.6 Serious physical assault and harm (including threat of harm with a weapon)

The Trust recognises that serious physical assault, violence and threats of harm involving a weapon are significant safeguarding concerns that place children and staff at risk of physical and emotional harm.

Such incidents may be associated with serious violence, child criminal exploitation, gang affiliation, bullying, peer-on-peer abuse or other safeguarding concerns.

All reports, disclosures or concerns relating to serious physical assault, possession of a weapon, or threats involving a weapon will be taken seriously and responded to immediately.

Staff must report concerns without delay to the DSL, who will assess the level of risk, ensure appropriate action is taken, and liaise with parents, children's social care, the police and other agencies as required.

Where there is an immediate risk of harm, emergency services will be contacted without delay.

The Trust expects that all schools ensure that all incidents are accurately recorded, appropriate risk assessments and safety plans are implemented, and that support is provided for both victims and perpetrators, recognising that children involved in violence may themselves be vulnerable or at risk of exploitation.

The Trust expects that school leaders will take a contextual safeguarding approach, working with partners to identify risks, prevent further harm and maintain a safe environment for all pupils.

16.7.1. Violence against Women and Girls

Violence Against Women and Girls (VAWG) is a term used to describe acts of violence, abuse, coercion, or harassment that disproportionately affect women and girls. It includes both criminal offences and harmful behaviours that can occur in families, relationships, communities, workplaces, schools, and online.

The UK Government's current cross-government strategy, "Freedom from Violence and Abuse", aims to halve violence against women and girls within a decade through prevention, tackling root causes, pursuing perpetrators, and supporting victims and survivors.

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Examples of VAWG include but are not limited to:

- Domestic abuse
- Sexual violence and rape
- Sexual harassment
- Stalking and harassment
- Coercive and controlling behaviour
- Child sexual abuse
- Female genital mutilation (FGM)
- Forced marriage
- So-called 'honour'-based abuse
- Human trafficking and sexual exploitation
- Online abuse, including image-based abuse and cyberflashing

VAWG is a significant safeguarding issue because it can have severe physical, emotional, psychological, educational, and social impacts on victims.

Many forms of VAWG intersect with child protection concerns, exploitation, mental health, attendance, and family functioning.

All CIT schools are expected to:

- Promote healthy and respectful relationships.
- Identify and respond to signs of abuse.
- Support victims and survivors.
- Challenge misogyny, sexism, and harmful attitudes.
- Deliver effective Relationships, Sex and Health Education (RSHE).
- Work with safeguarding partners and specialist services where concerns arise.

Potential indicators include:

- Anxiety, depression, self-harm, or withdrawal
- Attendance or attainment concerns
- Sudden behavioural changes
- Sexualised behaviour
- Fear of a particular individual
- Unexplained injuries
- Controlling or coercive relationships
- Disclosure of abuse online or offline

16.7.2. Misogyny and Harmful Attitudes Towards Women and Girls

The Trust recognises that misogyny, including prejudiced attitudes, discriminatory language, sexism, harassment and behaviours that demean, exclude or target women and girls, can be harmful and may contribute to a culture in which abuse is normalised.

The Trust is committed to promoting respect, equality and positive relationships and will challenge misogynistic attitudes and behaviours wherever they occur.

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Through safeguarding, curriculum provision, behaviour systems and pastoral support, the Trust will expect all CIT schools to educate pupils about healthy relationships, consent, respect and appropriate conduct, both online and offline.

Any incidents of misogyny or sexist behaviour will be taken seriously, reported as a safeguarding concern, recorded, risk assessed where appropriate, and responded to in accordance with Part 2 of this policy, the school behaviour policy and statutory safeguarding guidance.

The Trust recognises that such behaviours can be associated with wider safeguarding concerns and expects that schools will work with pupils, families and external agencies where necessary to safeguard and promote the welfare of all children.

16.7.3. Preventative culture work

The Trust expects all schools to be committed to creating a culture where violence against women and girls is actively prevented through education, positive relationships, effective safeguarding, and early intervention.

We aim for all CIT schools to promote respect, equality, and inclusion and challenge behaviours, attitudes, and stereotypes that contribute to abuse, harassment, and violence. Through each individual school's curriculum, staff training, student voice, and partnership working, the Trust expects leaders to seek to ensure that all members of the school community understand their role in preventing violence against women and girls and in creating a safe environment where concerns can be raised and addressed promptly.

The Trust believes that a preventative culture is one that:

- Promotes respect, equality, and inclusion.
- Challenges sexist language, stereotypes, and misogynistic attitudes.
- Encourages healthy, respectful relationships.
- Creates safe environments for reporting concerns.
- Supports victims and holds perpetrators accountable.
- Engages children, staff, parents, and the wider community.

16.8. Extremism and Radicalisation

The Trust recognises that protecting children from the risk of radicalisation and extremism is part of all our wider safeguarding responsibilities. Through a broad and balanced curriculum, opportunities for debate and critical thinking, and the promotion of fundamental British values, the Trust supports all CIT schools to seek to build pupils' resilience to extremist influences and support them to become safe, respectful and responsible members of society.

Radicalisation refers to the process by which a person comes to support extremist ideologies or terrorism, and it can affect children and young people from any background.

All CIT schools must have an up to date Prevent Risk Assessment which identifies the most prevalent local and contextual risks for extremism and radicalisation – and staff must be aware of what these are.

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In CIT schools all staff will be trained to recognise and remain vigilant to indicators that a pupil may be vulnerable to radicalisation and will act on concerns in accordance with the Trust's safeguarding procedures and those set down in Part 2 of this policy.

Concerns relating to radicalisation and extremism will be recorded, assessed and managed by each school as follows:

- Any concerns that a pupil may be vulnerable to extremist influences, radicalisation or terrorism must be treated as a safeguarding concern and reported immediately to the DSL or DDSL.
- Staff should not attempt to investigate concerns themselves.
- The DSL will assess the concern, consider the child's needs and level of risk, and determine the appropriate course of action in line with local safeguarding procedures and the Prevent Duty. Where appropriate, referrals may be made to Children's Social Care, the Police, Prevent or Channel processes.
- All concerns, discussions, decisions and actions taken will be recorded accurately and securely within the school's safeguarding recording system - CPOMS.

The Trust recognises that early identification, effective information sharing and timely intervention are essential in protecting children who may be at risk of radicalisation or involvement in extremist activity.

16.9. Serious violence

The Trust recognises that children can be both victims and perpetrators of serious violence and that involvement in violence may be linked to a range of safeguarding concerns, including criminal exploitation, county lines, gang involvement, substance misuse, adverse childhood experiences and child-on-child abuse.

All CIT school staff will be aware of indicators that may signal a risk of serious violence, including increased absence from school, changes in friendships or behaviour, decline in educational performance, unexplained injuries, possession of weapons, or involvement with groups known to engage in criminal activity.

Any concerns about a child at risk of, or involved in, serious violence must be reported immediately to the DSL.

The DSL will assess the risk, work with relevant agencies, consider the need for Family or Early Help or statutory intervention, and ensure that appropriate support, protection and risk management measures are put in place.

This may include reporting to social care or the police.

All concerns, decisions (including the reasons for these decisions) and actions will be recorded and managed in accordance with this policy's procedures and statutory guidance.

16.10.1. Harmful Sexual Behaviours – see appendix 1 – Child-on-Child Abuse Statement for more detailed information.

Harmful Sexual Behaviour (HSB) refers to sexual behaviours expressed by children and young people that are inappropriate for their age, stage of development or circumstances, and which may be harmful to themselves or others.

Such behaviours can occur online or offline and exist on a continuum ranging from inappropriate sexualised language and conduct to sexual harassment, sexual abuse and sexual violence.

The Trust recognises that harmful sexual behaviour is a safeguarding concern and will take all reports seriously.

Concerns will be responded to promptly, recorded appropriately, risk assessed, and managed in accordance with child protection procedures, ensuring that the needs and welfare of all children involved are carefully considered.

16.10. 2.. Sexual Violence and Sexual Harassment

The Trust recognises that sexual violence and sexual harassment can occur between children of any age and gender, both inside and outside of school and online.

Such behaviours are never acceptable, will not be tolerated, and should never be dismissed as banter, harmless behaviour, part of growing up, or "just having a laugh".

The Trust expects that all CIT schools will maintain a culture in which staff are trained and supported to recognise the signs of abuse, where all concerns are taken seriously, victims are supported and safeguarded, and allegations are responded to promptly, fairly and proportionately.

Any report of sexual violence or sexual harassment will be managed in accordance with statutory safeguarding guidance, with careful consideration given to the needs and wishes of the victim, the safety and welfare of all children involved, and any ongoing risk assessment.

The DSL will ensure that appropriate action is taken, including referrals to external agencies (which may include the police) where required, and that all concerns, decisions and actions are accurately recorded.

The Trust expects schools to provide education through curriculum provision of PHSE and RHSE to promote respectful relationships, consent, appropriate behaviour and a culture of zero tolerance towards sexual violence and sexual harassment.

16.11.1. Extra-familial harm

The Trust recognises that children may experience abuse, exploitation and safeguarding risks outside their families, known as extra-familial harm.

These risks can arise from interactions with peers, older children or adults, and within a range of environments including schools, neighbourhoods, online spaces and community settings.

Extra-familial harm includes, but is not limited to, child criminal exploitation, child sexual exploitation, serious violence, county lines activity, gang involvement, harmful sexual behaviour, online abuse and child-on-child abuse.

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The Trust acknowledges that these harms can have a significant impact on a child's safety, welfare and development.

All concerns relating to extra-familial harm will be treated as safeguarding concerns, reported promptly to the DSL, and responded to through appropriate assessment, intervention, information sharing and partnership working with families and relevant agencies.

The Trust is committed to all CIT schools identifying risks early, listening to the voices of children, and taking action to protect and support those who may be vulnerable to harm beyond the home.

16.11.2. Child Sexual Exploitation and Child Criminal Exploitation

The Trust recognises that Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal or sexual activity.

Children may be exploited even where the activity appears consensual, and exploitation can occur in person or online.

CCE can include involvement in county lines, forced criminality, drug-related activity, theft or violence, while CSE may involve coercion into sexual activity in exchange for money, gifts, affection, status, accommodation, drugs, alcohol or other perceived benefits.

The Trust recognises that any child can be at risk of exploitation and that indicators may include missing episodes, unexplained gifts or money, changes in behaviour, poor attendance, associations with older individuals, or concerns regarding online activity.

All concerns relating to CCE or CSE will be treated as safeguarding concerns, reported immediately to the DSL, appropriately recorded, risk assessed and referred to relevant agencies where necessary to ensure children receive timely protection and support. Schools will ensure that they work in line with local authority arrangements.

16.12.1. So-called Honour-based Violence and Abuse

The Trust recognises that honour-based abuse (HBA) is a safeguarding concern and a form of abuse committed to protect or defend the perceived honour of an individual, family or community.

Honour-based abuse can encompass a range of harmful practices, including forced marriage, female genital mutilation (FGM), and other acts of coercion, control, violence or intimidation.

Abuse may be carried out by family members or others within the community and can have a significant impact on a child's safety, wellbeing and rights.

The Trust acknowledges that children at risk of honour-based abuse may be reluctant to seek help and that concerns require a sensitive and safeguarding-led response.

All staff at CIT schools will remain vigilant to indicators of honour-based abuse and will report any concerns immediately to the DSL. Concerns will be treated as child protection

matters, recorded appropriately, and referred to relevant agencies in accordance with statutory safeguarding procedures. This will include the police if FGM is suspected.

16.12.2 Female Genital Mutilation

The Trust recognises that Female Genital Mutilation (FGM) is a form of child abuse and violence against women and girls and is a serious safeguarding concern.

FGM comprises all procedures involving the partial or total removal of external female genitalia, or other injury to the female genital organs for non-medical reasons. It is illegal in the UK and can have severe lifelong physical, emotional and psychological consequences. Staff must be alert to the potential indicators that a pupil may be at risk of, or has undergone, FGM and should follow the Trust's safeguarding procedures immediately where concerns arise.

The Trust will expect all schools to fulfil their mandatory duty to train all staff to recognise signs and symptoms and carry out their reporting duty in relation to Female Genital Mutilation where applicable and will work with partner agencies to safeguard children who may be at risk. These are as follows:

In England and Wales, teachers have a mandatory duty to report to the police when, in the course of their professional work, they discover that FGM has been carried out on a girl under 18. This applies where:

A girl under 18 discloses that she has undergone FGM; or

The teacher directly observes physical signs that FGM has been carried out.

However, if there is concern that a girl is at risk of FGM or is a suspicion that FGM may have taken place, the response is to follow school and local safeguarding procedures including making a referral to children's social care.

16.13. Modern Slavery and Human Trafficking

The Trust recognises that modern slavery and human trafficking are serious forms of child abuse and exploitation that can have a significant impact on a child's safety, wellbeing and development.

Modern slavery can include:

- Human trafficking,
- Forced labour,
- Debt bondage,
- Domestic servitude,
- Criminal exploitation and
- Sexual exploitation.

Children may be targeted, recruited, transported, harboured or controlled through coercion, intimidation, manipulation or deception for the purpose of exploitation.

The Trust acknowledges that victims may not recognise themselves as being exploited and that indicators can include missing episodes, unexplained absences, changes in

behaviour, poor attendance, association with controlling individuals, signs of neglect, possession of unexplained money or gifts, or involvement in criminal activity.

All concerns relating to modern slavery or human trafficking will be treated in all CIT schools as safeguarding concerns and reported immediately to the DSL.

Concerns will be recorded, risk assessed and referred to appropriate agencies where necessary, ensuring that children receive timely protection, support and intervention in accordance with statutory safeguarding guidance and local multi-agency procedures.

16.14. Private Fostering and Kinship Care

The Trust recognises that some children may live in arrangements other than with their birth parents and that such arrangements may present additional safeguarding considerations.

Private fostering occurs when a child under the age of 16 (or under 18 if disabled) is cared for and provided with accommodation by someone who is not a parent, person with parental responsibility, or a close relative, for a period of 28 days or more.

Where the school becomes aware of a private fostering arrangement, the DSL will ensure that the appropriate local authority is notified, as there is a legal duty to assess and monitor such arrangements.

The Trust also recognises the important role of kinship care, where a child is raised by a relative, friend or other connected person when parents are unable to provide care.

In school, all staff will be alert to the vulnerabilities and support needs that children in kinship care or private fostering arrangements may experience and will work with families and partner agencies (including Virtual Schools) to promote their welfare, educational achievement and emotional wellbeing.

All CIT schools will work closely with the Virtual School in promoting the educational outcomes, attendance, wellbeing and participation of children who may be vulnerable to poorer outcomes.

In line with statutory guidance, Virtual Schools have a strategic role in promoting the education of children in kinship care and other children with a social worker, working with schools, local authorities, carers and other professionals to improve educational achievement and remove barriers to learning.

While children in private fostering arrangements are not automatically within the Virtual School's remit, schools should work closely with the local authority and seek advice from the Virtual School where appropriate to support educational progress and welfare needs.

The DSL and other relevant staff will engage with the Virtual School and partner agencies to ensure that children in kinship care and those living in private fostering arrangements receive appropriate support, have their needs identified at an early stage, and are able to achieve positive educational and personal outcomes.

Any safeguarding concerns relating to these arrangements will be managed in accordance with the Trust's and individual schools safeguarding procedures as well as statutory guidance.

16.15. Pupils with family members in prison

The Trust recognises that pupils who have a parent, carer or close family member in prison may experience significant emotional, social and educational challenges, including anxiety, stigma, loss, attachment difficulties, financial hardship and changes in caregiving arrangements.

These pupils may be considered vulnerable and may benefit from additional pastoral support to help them achieve positive outcomes.

Staff in all CIT schools will be mindful of the impact that parental imprisonment can have on a child's wellbeing, behaviour, attendance and attainment and will seek to provide a safe, supportive and inclusive environment in which pupils feel listened to and understood. Where appropriate, the DSL and relevant staff will work with families, carers and external agencies to identify and respond to the child's needs, ensuring that support is provided at the right time and that any safeguarding concerns are addressed promptly.

The Trust expects that all schools treat information relating to a family member's imprisonment sensitively and confidentially, sharing information only where necessary to safeguard and promote the welfare of the child.

16.16. Children who are questioning their gender

The Trust recognises that children who are questioning their gender may require sensitive, individualised and safeguarding-led support.

In accordance with *Keeping Children Safe in Education 2026*, any request relating to social transition or changes to the way a child is treated in school will be considered carefully on a case-by-case basis, with the child's welfare, safety and best interests as the primary consideration.

Schools will not initiate social transition, and any request will be led through the DSL, involving parents or carers as a matter of priority unless there is reason to believe that doing so would place the child at risk of significant harm.

Decisions will be made following a documented assessment of the child's needs, considering safeguarding responsibilities, relevant legal duties, the rights and wellbeing of all children affected, and any appropriate professional advice.

The Trust expects that all CIT schools will ensure that children are treated with dignity and respect and that any safeguarding, welfare or mental health concerns identified during this process are responded to in accordance with child protection procedures.

17.1. Training

The Trust is committed to ensuring that all staff receive appropriate safeguarding and child protection training to enable them to fulfil their safeguarding responsibilities effectively.

In accordance with *Keeping Children Safe in Education 2026*, all staff will receive safeguarding and child protection training, including online safety, at induction and regular updates thereafter. CIT has a bespoke 3 Year Training Pathway that clearly sets out expectations of safeguarding training for all Trust roles. Schools must follow this guidance.

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Staff will be provided with relevant safeguarding policies and guidance and will receive ongoing safeguarding updates, at least annually, to ensure their knowledge and skills remain current and effective.

Schools must maintain an up-to-date and accurate record of all staff safeguarding training that will be regularly scrutinised by the central team to ensure compliance.

17.2. Trust Board and LSB

All Trustees and LSB members must receive appropriate safeguarding and child protection (including online) training at induction.

They will undertake an annual refresher training as set out in the CIT 3 Year Training Pathway.

This training will focus on their strategic role and not on operational procedures and will ensure they are equipped with the knowledge to provide strategic challenge to test and assure themselves as a 'critical friend' that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. This will include checking how school leaders ensure that safeguarding is embedded into the culture and daily life of the school.

It is the responsibility of the school to ensure that all members of the LSB will receive the appropriate safeguarding training on induction and follow the Trust pathway.

The Chair of the Trust Board will ensure that all Trustees complete the expected training.

17.3. Leaders including DSLs and DDSLs.

All Headteachers and senior leaders will have annual safeguarding training and follow the CIT 3-year training pathway.

The DSL and the DDSLs in every school must be trained to the same standard (following the pathway requirements) to ensure that the DDSL can adequately discharge the responsibility of the DSL in their absence.

The DS and DDSLs will undertake training that equips them to carry out their roles and responsibilities and will refresh this training at least every two years, alongside regular updates (from the termly CIT DSL Forum) to maintain knowledge of local and national safeguarding developments.

Any leader who undertakes the training of others will themselves have the appropriate training before they deliver safeguarding training to others.

17.4. Teachers and Staff

School leaders and the LSB will ensure that all staff undergo the required safeguarding and child protection training at induction before they have any regulated activity access to children.

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All staff will access and engage with the CIT agreed Annual Safeguarding Training as set out in the CIT 3-Year Pathway. All supplemental units set out in the pathway will be completed by the given deadlines. School leaders are responsible for checking the ongoing effectiveness and retention of this training.

Induction and training will be in line with the relevant local authority recommendations.

All staff will receive regular safeguarding and child protection updates, including online safety (for example, via email, e-bulletins, staff meetings) including from the CIT monthly safeguarding bulletin.

School leaders will ensure all staff have access to the local authority and Trust updates on a specific bulletin board easily accessible in the school.

17.5 Volunteers

All volunteers who undertake any regulated activity in school will receive the CIT recommended safeguarding training before they work with children.

They will be expected to know the same safeguarding information as other adults working in the school – how to recognise, report and respond to safeguarding concerns.

They will need to be able to access all school policies related to safeguarding and the safeguarding notice board.

18.1. Curriculum

The Trust recognises that safeguarding is an integral part of the curriculum and plays a key role in preventing abuse, reducing vulnerability and helping pupils to keep themselves safe for life.

In accordance with Keeping Children Safe in Education 2026, pupils will be taught about safeguarding, including online safety, healthy and respectful relationships, consent, mental wellbeing, personal safety, exploitation, discrimination, extremism, and how to recognise and report concerns at an age and stage developmentally appropriate level.

Through a broad and balanced curriculum, including Relationships Education, Relationships and Sex Education (RSE), Health Education and wider pastoral opportunities, pupils will be given age-appropriate knowledge and skills to identify risks, build resilience, make informed decisions and seek help when needed.

The Trust expects that all CIT schools will create an open and supportive culture in which pupils feel safe, listened to and confident that their concerns will be taken seriously. Safeguarding themes will be embedded across school life and adapted to meet the needs, ages and vulnerabilities of pupils.

Details of individual school curriculum provision will be set out in Part 2 of this policy.

18.2. RHSE

The Trust recognises that Relationships Education, Relationships and Sex Education (RSE) and Health Education are important elements of its preventative safeguarding curriculum. Through an age-appropriate, inclusive and evidence-informed RHSE programme, pupils at all CIT schools will be taught about healthy and respectful

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relationships, consent, boundaries, online safety, mental wellbeing, personal safety, equality, diversity, and how to recognise and respond to abuse, exploitation and harmful behaviours.

RHSE will support pupils to develop the knowledge, skills and confidence needed to build positive relationships, make informed decisions, manage risk and seek help when required.

The Trust will ensure that all schools have a compliant RHSE policy and curriculum and that parents have been consulted appropriately.

All school websites will display the correct information required by the 2026 RHSE guidance for schools - [Relationships Education, Relationships and Sex Education and Health Education guidance](#)

School leaders will ensure that RHSE is delivered in accordance with this statutory guidance, is sensitive to the age, developmental stage and needs of pupils, and contributes to creating a culture in which children feel safe, respected and able to discuss concerns.

The curriculum will support pupils to understand how to keep themselves and others safe both online and offline, and individual school provision for RHSE will be detailed in Part 2 of this policy.

18.3. Preventative Education

The Trust recognises that preventative education is a fundamental component of effective safeguarding and plays a vital role in helping children to protect themselves from harm.

We define preventative education as the planned teaching and learning opportunities that help children recognise risks, stay safe, develop resilience, and know how and when to seek help.

It is a key element of a school's safeguarding strategy and aims to reduce the likelihood of harm occurring by equipping pupils with the knowledge, skills and understanding they need to navigate challenges safely.

In accordance with *Keeping Children Safe in Education 2026*, the Trust expects that schools will provide a broad, balanced, ability and age-appropriate curriculum that equips pupils with the knowledge, skills and confidence to recognise risks, make informed decisions and seek help when needed. Preventative education will address a wide range of safeguarding issues, including online safety, healthy and respectful relationships, consent, mental wellbeing, bullying, discrimination, child-on-child abuse, sexual harassment and violence, exploitation, extremism, substance misuse and personal safety. There will be a focus on the contextual safeguarding risks the school have identified as being the most prevalent in the school community (Part 2 of this policy, Para 2).

Through age-appropriate strategies such as teaching, assemblies, pastoral support and wider enrichment opportunities, pupils will be encouraged to develop resilience, critical thinking and an understanding of how to stay safe both online and offline. The Trust will ensure that all CIT schools prioritise safeguarding messages being embedded throughout school life. These will be adapted to meet the age, developmental stage and individual

needs of pupils, creating a culture in which children feel safe, respected, listened to and empowered to raise any concerns.

19.1. EYFS

Children learn best when they are healthy, safe, secure, when their individual needs are met, and when they have positive relationships with the people caring for them.

The EYFS Statutory Framework [EYFS statutory framework for group and school-based providers](#) sets out the safeguarding and welfare requirements childminders must meet. They are designed to help childminders create a high-quality, welcoming, and safe setting where children can enjoy learning and grow in confidence.

19.2. Paediatric First Aid

At least one person who has a current paediatric first aid (PFA) certificate must be on the premises and available at all times when children are present and must accompany children on outings. The certificate must be for a full course consistent with statutory guidance. PFA training must be renewed every three years and be relevant for people caring for young children.

19.3. Safer Eating

Where children are provided with meals, snacks, and drinks, these must be healthy, balanced and nutritious. To understand how to meet this requirement, providers must have regard to the 'Early Years Foundation Stage nutrition guidance'. Fresh drinking water must always be available and accessible to children.

Whilst children are eating there should always be a member of staff in the room with a valid and full paediatric first aid certificate.

Before a child is admitted to the setting the school must obtain information about any special dietary requirements, preferences, food allergies and intolerances that the child has, and any special health requirements. This information must be shared with all staff involved in the preparing and handling of food. At each mealtime and snack time adults in the room must be clear about who is responsible for checking that the food being provided meets all the requirements for each child.

Where relevant and developmentally appropriate, school leaders must have ongoing discussions with parents and/or carers about the stage their child is at regarding introducing solid foods, including understanding the textures the child is familiar with. Assumptions must not be made based on age. The school must prepare food in a suitable way for each child's individual developmental needs.

All Nursery and Reception children must remain seated safely in an appropriately sized low chair while eating. Where possible classrooms should identify a designated eating space where distractions are minimised.

Children must always be within sight and hearing of a member of staff whilst eating. Choking can be completely silent; therefore, it is important for providers to be alert to when a child may be starting to choke. Where possible, providers should sit facing children

whilst they eat, so they can make sure children are eating in a way to prevent choking and so they can prevent food sharing and be aware of any unexpected allergic reactions. When a child experiences a choking incident that requires intervention, the Trust expects leaders to make sure staff record details of where and how the child choked and ensure parents and/or carers are made aware.

The records should be reviewed periodically to identify if there are trends or common features of incidents that could be addressed to reduce the risk of choking. Appropriate action should be taken to address any identified concerns.

20.1. Safer Recruitment at CIT

Safer recruitment ensures that every new member of staff understands their duties to safeguard young people from the outset starting from the advertisement, through the interview, to their induction, and start at the school. It is essential that no one gets to work with children who cannot keep them safe.

The Trust will always endeavour to ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the children as a safe and trustworthy adult including e.g., volunteers and staff employed by contractors.

CIT has a separate Safer Recruitment Policy that all departments including schools must adhere to: [Safer-Recruitment-Policy-November-2025.pdf](#). It sets out the detail of how all recruitment procedures will be undertaken to all roles within the Trust.

This includes the Trust expectations for the following areas:

- Advertising
- Shortlisting
- Invitation to interview
- Checking References
- The Interview procedures
- Pre-appointment checks – vetting checks done at the centre. This includes social media checks and references.
- After the pre-appointment checks
- Single central record (SCR)
- Safer recruitment training expectations

20.2 Induction

It is a Trust expectation that all new staff and volunteers in any CIT school will receive a full safeguarding induction and are briefed on the code of conduct for adults working with children. All new staff and volunteers will receive copies of the relevant safeguarding policies and expectations before they start their role in school (See CIT 3-Year Training Pathway Document).

All schools must comply with the central CIT Induction Policy - [Induction-Policy-November-2025.pdf](#)

20.3. Single Central Record (SCR)

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A Single Central Record (SCR) is the statutory record that schools and academy trusts must maintain to demonstrate that required pre-employment and safeguarding checks have been completed for staff and other individuals working in the school.

Under KCSiE 2026, the SCR helps schools' evidence safer recruitment practices and ensure that those working with children are suitable to do so.

As set out in the CIT Safer Recruitment Policy, each CIT school will maintain and regularly update their SCR. It must meet the statutory requirements as set out in KCSiE 2026.

The SCR will be accessible to the Trust leadership and audited at regular intervals. All new employees will be added to the record, which will include:

- All staff (including supply staff) who work at the Trust.
- All others who work in regular contact with children within the Trust, including volunteers.
- All members of the proprietary body.

The bullet points below set out the minimum information that must be recorded in respect of staff members (including teacher trainees on salaried routes). The record will indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- Further checks on people living or working outside the UK
- A check of professional qualifications
- A check to establish the person's right to work in the UK
- For those in management, trustee or governor roles, a section 128 check
- Whether a Disqualification from Childcare self-declaration is required for role and has been received (*this is a CIT requirement for our schools' SCR*)

For our schools with Early Years settings where they are subject to the Early Years Foundation Stage Framework, an individual MUST NOT begin working within the provision until the school has received the individual's enhanced DBS check certificate (or notification from the central team that they have this in place) including Barred List information.

This includes volunteers who must not be operational in any EY setting while awaiting their DBS check, even under supervision.

For supply staff, the SCR must hold detail of the written confirmation that has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, and the date that confirmation was received and whether any enhanced DBS check certificate has been provided in respect of the member of staff.

On entry into school

All checks that are carried out on volunteers must be recorded in the SCR.

20.4. Disqualification From Childcare

The Trust expects that all CIT schools comply with all statutory requirements relating to disqualification from childcare. Where applicable, appropriate checks and safeguarding procedures will be undertaken to ensure that individuals who are disqualified from providing childcare, or who are subject to relevant restrictions, are not employed in roles covered by the Childcare Act 2006 and associated regulations.

This applies to CIT staff who work in the following areas or manage:

- Early years childcare for children from birth until 1 September following their 5th birthday (typically nursery and reception-age children).
- Later years childcare for children under the age of 8 in childcare provision outside normal school hours, such as breakfast clubs and after-school clubs.

This will include senior leaders who are responsible for the management of these areas.

The Trust has a self-declaration form that these staff are expected to complete on appointment that states they have no aspects of the Disqualification from Childcare Act 2006 that would prohibit them from undertaking their role. These forms will be kept on the personnel file and recorded on the SCR.

School can decide to renew these forms as they require.

All staff MUST make the Headteacher aware if the status of this self-declaration changes at any point before it is renewed.

Staff are expected to disclose any information that may affect their suitability to work with children, and any concerns will be managed in accordance with safer recruitment and safeguarding procedures.

20.5. Supply teachers and agency staff

Before any supply teacher or agency staff have access to pupils, the school must have received the appropriate and compliant information in writing from their employer that the required and relevant checks (as set out in KCSiE 2026) have been carried out on the supply staff and that appropriate certificates have been obtained.

Aside from this letter of assurance, the school will not need to see or retain any of this documentation. They need to check the photo ID to prove the agency assurance links to the person that is in school.

The documentation their employer must provide detail of includes the following:

- an enhanced DBS certificate has been obtained.
- a barred list check has been completed where required.
- identity checks have been undertaken.
- qualification checks have been completed where required; and
- any other relevant safer recruitment checks have been carried out.

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The Trust requires that where the person will be undertaking a role with pupils that are covered by the Disqualification from Childcare Act 2006 the written confirmation will need to include these checks.

Each school SCR must record the date that the identity of the individual (including visual scrutiny of photo ID) has been checked against the documentation supplied by their employer to verify their identity before they are permitted to enter the school site.

If at any point we are concerned about whether safer recruitment procedures have been implemented to employ a member of staff who is intending to work in our school, we will immediately contact the organisation to check. We will also feedback any concerns we have about the staff and expect the agency to action this.

The Trust reserve the right to deny access to any supply or agency staff to CIT schools' premises if any concerns arise around the safer recruitment process.

Supply staff must be recorded on the SCR even if they are only in school for 1 day. However, they should be removed from the SCR when the term of an assignment ends and there is no ongoing arrangement with the school for this to continue. This ensures that the identity and checks are re-done when a new period of engagement begins.

All agency supply staff must be removed from the SCR at the end of each academic year and re-entered if they are re-assigned in the new academic year.

20.6 Volunteers.

Volunteers play an important role in our school and we value the work they do. Schools must declare their volunteers to the central HR team who will ensure that appropriate checks are carried out and recorded. If the volunteer is to undertake a regulated activity, this must include an enhanced DBS check.

The school must ensure that no volunteer is left unsupervised or allowed to work in regulated activity with a child without these checks or the required induction and safeguarding training (see the CIT 3 Year Safeguarding Training Pathway).

20.7.1 Contractors

The Trust will expect all schools to undertake a risk-based approach to managing contractors on school sites and schools will ensure that they:

- Verify identity on arrival.
- Ensure safeguarding and site arrangements are understood.
- Never allow a contractor for whom appropriate checks have not been undertaken to work unsupervised in regulated activity

All contractors will be required to provide photographic identification on arrival and comply with school safeguarding procedures.

Where contractors work regularly with children or may have unsupervised access to pupils, appropriate safeguarding checks, including enhanced DBS and barred list checks

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where required, will be evidenced through direct checks or written confirmation from the employing organisation. Contractors who have not undergone appropriate checks will not be permitted to undertake regulated activity or have unsupervised access to children.

Contractors will need to be recorded on the Single Central Record if they are employed directly by the school or work regularly in school in circumstances where safeguarding checks are required.

The Trust recommends that a contractor is seen as being in school regularly if they are on site at least once a term. If a contractor is in school regularly and undertake regulated activity, the school should maintain evidence that appropriate checks or assurances have been obtained.

The decision should be based upon regularity, nature of work, level of access to pupils and safeguarding risk.

20.7.2. Contractors who have no opportunity for regular contact with pupils.

This would be for example, emergency repair engineers working after school, delivery drivers, or contractors working in segregated areas. The school needs to:

- Check identity on arrival.
- Ensure appropriate supervision and site management arrangements.
- Ensure the contractor does not have unsupervised access to pupils.

These contractors do not need to be on the school's SCR

20.7.3. Contractors who have regular access to pupils but are supervised.

This would be for example, contractors working on a building project during term time where school staff supervise access. The school should:

- Undertake a risk assessment.
- Verify identity.
- Always ensure adequate supervision.
- Consider whether a DBS check is appropriate based on the nature of the work.

These contractors only need to be on your SCR for the duration of their project.

20.7.4. Contractors who have regular contact with pupils and may be unsupervised

This would be for example, peripatetic instructors or specialist contractors working directly with pupils. The school should ensure:

- An Enhanced DBS check has been completed.
- A Children's Barred List check has been completed where the role meets the definition of regulated activity.
- Written confirmation of employment checks (as set out in KCSiE 2026) is obtained from the employer or contracting organisation where relevant.

These contractors must be on your SCR until they are no longer coming in to school.

The SCR tab for contractors should therefore set out the following:

That an identity check has been carried out, and what form of identification was seen (e.g., passport, driver's license). The date of this check must be recorded.

Whether the contractor is undertaking a regulated activity or not.

If the contractor's work involves regulated activity (direct contact with children), an enhanced DBS check, including a check of the children's barred list, is required. The SCR should record the issue and expiry date of the DBS certificate as set out in the letter of assurance received from their employer.

If the contractor might interact with children in a teaching or training capacity, a check to see if they are prohibited from teaching is necessary.

22.1. Organisations using school premises and extended school activities

Where a CIT School provides services or activities directly under the supervision or management of school staff, the school's arrangements for safeguarding and child protection will apply.

However, across our family of CIT schools, parts of school premises might from time to time be used by individuals or organisations outside of the usual school hours for different purposes. When a school hires out its premises to external organisations, safeguarding responsibility does not disappear. KCSIE 2026 and the Trust expects schools to have appropriate safeguarding arrangements for community users and third-party providers operating on site.

Part 2 of this document will set out usage of premises contextual to the individual school.

Where services or activities are provided separately by another body, leaders and the LSB will seek assurance in writing that the body concerned adheres to the guidance: After-school clubs, community activities, and tuition

Where Trust premises are hired or used by external organisations, the Trust will seek assurance that the school has made sure that the hirer has appropriate safeguarding and child protection arrangements in place. Organisations providing services or activities for children must demonstrate that they have suitable safeguarding policies, safer recruitment procedures, appropriate DBS arrangements, and clear processes for managing and reporting safeguarding concerns. The Trust reserves the right for schools to refuse or withdraw access where safeguarding expectations are not met according to safeguarding guidance for providers - [After-school clubs, community activities, and tuition - safeguarding guidance for providers](#)

Schools should ensure that:

- A written hire or lettings agreement is in place.
- The organisation has appropriate safeguarding and child protection policies where children are involved.
- The organisation has safer recruitment procedures and carries out appropriate DBS checks on its staff and volunteers.

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- Clear arrangements exist for reporting safeguarding concerns, allegations or disclosures involving children.
- The school knows who has overall safeguarding responsibility within the hiring organisation.
- Appropriate insurance, health and safety, and risk assessment arrangements are in place.
- Site access, supervision and security arrangements are agreed and monitored.

Where an organisation is providing activities directly for children, schools should seek assurance that:

- Staff and volunteers have undergone appropriate suitability checks.
- The provider has a designated safeguarding lead or equivalent safeguarding arrangements.
- There is a procedure for sharing safeguarding concerns with the school and statutory agencies where required.

21.2. Reporting safeguarding concerns

If any CIT school is used by an external organisation for the purposes of running activities for children and as a result, we receive an allegation relating to an incident that happened when an individual or organisation was using their school premises then as with any safeguarding allegation, we will ensure that we follow our school and Trust safeguarding policies and procedures, including informing the LADO.

22. Regulations and safeguarding requirements relating to school premises.

In accordance with KCSIE 2026, the Trust will require all CIT schools to provide separate toilets for boys and girls aged 8 and over, apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time.

Where a pupil does not wish to use the facilities designated for their biological sex, the school will consider appropriate alternative arrangements, such as self-contained individual toilet facilities, considering the safety, privacy, dignity and wellbeing of all pupils. Any such arrangements will be considered on an individual basis and managed through the school's safeguarding procedures.

Schools must not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex. This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

The Trust requires schools to provide suitable changing accommodation and showers for pupils who are aged 11 years or over at the start of the school year. This means that the changing accommodation and showers must be suitable for the pupils they are provided

for, having regard to their ages, numbers, and sex and any special requirements they may have and is informed by the school's safeguarding obligations.

When responding to a request to support any degree of social transition, a school must not allow a child access to changing rooms designated for the opposite sex.

23.1. Quality assurance and monitoring

The Trust central safeguarding team alongside the Directors of Education will have a responsibility for checking the accuracy of how school leaders assess the effectiveness of safeguarding in all CIT schools. There will be a planned series of monitoring events scheduled throughout the academic year.

These will include the following:

23.2. Safeguarding audits

All DSLs will complete the CIT Safeguarding Audit tool. This is an ongoing, RAG rated spreadsheet of 10 competencies (11 if the school has an EYFS department). Schools will have to be at least 90% compliant to be able to assess safeguarding as effective.

The Safe@CIT Team will have access to this document via SharePoint and will review progress to 100% compliance at each visit.

23.3. Trust reviews

Safeguarding will be reviewed as part of the following central team mechanisms:

- School Reviews. These are planned and undertaken by Directors of Education.
- External reviews – the Directors of Education in conjunction with the Director of safeguarding will select a small sample of schools each academic year to have a review from a specialist external provider.

This review will support assurance to the Trust Board that both school and central team judgements are accurate.

- Safe@CIT Safeguarding reviews.
There is a termly cycle of review work that checks selected aspects of safeguarding.

Autumn Term	Spring Term - Culture Check	Summer Term – Focussed spotlight check
Check readiness for the academic year. Policy in place Training complete Compliance sorted Action plan written	This is where central team check the impact of the Autumn term training. Check staff knowledge and understanding of signs and symptoms of abuse and how to report concerns. Check with pupils they feel safe and that they remember their	An aspect of safeguarding provision from the CIT Audit will be looked at in depth to ensure accurate assessment of effectiveness. Central team will check schools are ready for the next academic year.

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	safeguarding curriculum content.	
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23.4. Reporting to LSB and Trustees

All safeguarding review activities will provide Headteachers with written summary of findings.

Headteachers will share a summary of the report with the LSB as part of their Headteachers Report.

The Director of Safeguarding will ensure that the Trustees have accurate information about the effectiveness of safeguarding across all CIT schools.

24. Other relevant CIT Trust Policies

[Allegations-of-Abuse-Made-Against-Staff-Policy-Summer-2026.pdf](#)

[Staff-Code-of-Conduct-Spring-2026.pdf](#)

[CIT-Complaints-Policy-Mar-25-amended-Jan-26-V3.pdf](#)

[SG1-Domestic-Abuse-Policy-Spring-2026.pdf](#)

[LAC-CiC-Policy-January-2026.pdf](#)

[HR19-Modern-Day-Slavery-Human-Trafficking-Policy-Statement-Spring-26.pdf](#)

[Restrictive-Intervention-Policy-Part-1.pdf](#)

[Safer-Recruitment-Policy-November-2025.pdf](#)

[HS7-Supporting-Pupils-with-Medical-Conditions-Trust-Policy-2026.pdf](#)

[HR7-Whistleblowing-Policy-Summer-2026.pdf](#)

25. Review of this policy

This Safeguarding and Child Protection Policy Part 1 sections 1A and 1B will be reviewed by the Director of Safeguarding annually to ensure it remains current and incorporates all revisions made to local or national safeguarding guidance.

The Trust Board will review and agree Part 1A.

If mid-year amendments are required due to any national or Trust policy changes then this will be done centrally, agreed with the Trust Board where relevant then distributed to schools.

Each individual school's Headteacher and the Designated Safeguarding Lead will review Part 2 on a regular basis to ensure it reflects current staff and wider school arrangements.

This policy Part 2 will go to every school LSB for approval and sign off either at the first Autumn term meeting or by email for response. It needs to have been agreed and on the website before the end of September.

Part 2 – School Contextual Information:

Part 2 of this policy stands as an operational, working document that details **how** the statutory guidance will be implemented in our individual CIT school. Statutory guidance and Trust expectations have not been repeated in this part of the policy.

All staff must have read Part 1 and Part 2 must be available to staff, visitors and those in regulated activity at our school.

Contents:

Para:	Title:
1	School intent statement
2	Contextual Safeguarding at our school.
3	Roles and responsibilities
4	Recognising, responding and recording
5	Family Help and Early help.
6	Child on child abuse
7	Low level concerns –
8	Concerns that meet harm threshold
10	How we work with external agencies
11	DSL cover during closure times
12	Curriculum
13	Online Safety
14	Filtering and Monitoring
15	Organisations using school premises and extended school activities
15	Other relevant school policies
16	Complaints
17	Monitoring and Review

Para		
1	School intent statement	At Foxfields Academy, our intent is for every pupil to feel safe, valued, understood and able to succeed, regardless of their starting point or previous experiences. We recognise that many of our pupils have experienced barriers to learning, including trauma, disrupted relationships, adverse childhood experiences and difficulties with emotional regulation. Our approach is therefore rooted in strong relationships, consistency, compassion and high expectations. We provide a personalised, inclusive education that develops pupils academically, socially, emotionally and personally, enabling them to recognise their strengths, build resilience, develop positive relationships and become increasingly independent. We believe that every young person can make progress when the right support, opportunities and trusted relationships are in place.

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		Our intent extends beyond individual pupils to staff, families and the wider school community. We aim to create a culture in which everyone feels that they belong and has a shared responsibility for helping our pupils thrive. We work closely with families and professionals to understand each pupil holistically and to ensure that support is responsive to their individual needs and circumstances. Through our curriculum, pastoral provision and wider opportunities, we seek to remove barriers, raise aspirations and prepare pupils for successful and fulfilling lives beyond school. Our ultimate aim is that pupils leave us with the confidence, skills, resilience and positive sense of self needed to participate safely and successfully in their communities and wider society.
2	Contextual Safeguarding at our school.	At Foxfields Academy, we recognise that safeguarding cannot be considered solely in relation to what happens within a pupil's home or within the school environment. Our pupils may be particularly vulnerable to risks within the wider contexts in which they live, learn, travel and socialise, including peer relationships, community settings and online environments. We therefore take a contextual approach to safeguarding, seeking to understand the individual circumstances, experiences and vulnerabilities of each pupil and how these may interact with risks beyond the school gates. This includes being alert to issues such as exploitation, harmful peer relationships, bullying, online safety, substance misuse, criminal or sexual exploitation, missing episodes and risks associated with the local community. Our safeguarding practice is based on early identification, strong relationships, information sharing and partnership working. Staff are expected to know their pupils well, recognise changes in behaviour or presentation and understand that behaviour may be a form of communication or an indicator of an underlying safeguarding concern. We work proactively with parents and carers, social care, police, health services and other relevant agencies to build a comprehensive understanding of risk and to put appropriate protective measures in place. Where concerns arise, we consider not only what has happened to the child, but also where, when, with whom and in what circumstances the risk is occurring, enabling us to respond to the wider context and reduce the likelihood of harm. At present our most prevalent contextualised safeguarding issues are: Online Safety: The vast majority of pupils who attend Foxfields have access to the internet and social media platforms. Online Safety concerns contribute to the highest percentage of safeguarding logs at Foxfields. In school, we use the SENSO monitoring system to ensure a quick follow up response for inappropriate use of technology in school. All SENSO incidents are logged on CPOMS with any

follow up actions. Additionally, our filtering system Securly will ensure harmful content is blocked on school devices. Each classroom has a HELP poster displayed to clearly outline the process pupils should follow if they come across harmful content on a school device. All pupils hand in any personal electronic devices on arrival to school and are not permitted to have access to them throughout the day. Online Safety is promoted through multiple areas of the curriculum, including a dedicated term allocated in computing. Furthermore, we host external workshops and guest speakers from Leicestershire Police specifically focused on Online Safety.

CCE:

The DSL and all DDSLs at Foxfields have undertaken external Leicestershire County Safeguarding Training to ensure a deeper understanding of CCE in Leicestershire. Additionally, the DSL receives updates for out of county areas. Referrals can be made to social services to request a CCE social worker if there are specific concerns of this nature. CCE is factored into the curriculum via PSHE lessons. Leicestershire Police deliver CCE workshops in school throughout the year.

SEMH:

Pupils at Foxfields have an increased vulnerability of understanding and maintaining relationships and increased vulnerability of perception of safety, both physically and emotionally. At Foxfields, we teach pupils about their own individual needs, with a focus on SEMH and subsequent strategies that can be used to best prepare pupils for life after school. Throughout the year, the school holds themed days based on SEMH. Workshops include guest speakers who have had similar experiences.

Transport:

Pupils at Foxfields travel from a range of different areas across Leicestershire, with a small number travelling from out of county areas. Travel increases the school day significantly for the vast majority of pupils. When pupils arrive in the morning, Foxfields offer breakfast on arrival to support the transition into the school day. During this time, there is also an opportunity for discussion and reflection which also facilitates a smooth transition into the school day and allows any necessary pastoral support to be identified. Foxfields have a dedicated staff member who oversees transport and liaises with the local authority transport team and parents/carers. All pupils at Foxfields have access to Outdoor Education and external trips where the school use their minibuses. During these weekly sessions, travel safety is factored into the experience. Additionally, travel training/road safety is factored into the curriculum. There is a weekly focus around contextualised issues as part of our staff safeguarding quiz for all staff. Additionally, there is ongoing reflection focused on how we mitigate against our contextualised

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		issues and a focus on how we stay up to date and continually develop our offer.		
3	Roles and responsibilities	Role:	Name:	Contact:
		DSL	Megan Richardson	megan.richardson@foxfields-cit.co.uk
		DDSL	Jo Urry	jo.urry@foxfields-cit.co.uk
			Ruth Lloyd	ruth.lloyd@foxfields-cit.co.uk
			Rebecca Pridmore	rebecca.pridmore@foxfields-cit.co.uk
			Ashley Caress	ashley.caress@foxfields-cit.co.uk
			Juliette Brown	juliette.brown@foxfields-cit.co.uk
			Scott Hamilton	scott.hamilton@foxfields-cit.co.uk
			Louise Lewis	louise.lewis@foxfields-cit.co.uk
			Yasmine Brennan	yasmine.brennan@foxfields-cit.co.uk
			Natalie Thompson	natalie.thompson@foxfields-cit.co.uk
		LAC/CiC	Juliette Brown	juliette.brown@foxfields-cit.co.uk
		SENDCo	Louise Lewis	louise.lewis@foxfields-cit.co.uk
		LSB named Safeguarding governor	Kathryn Cook	kathryn.cook@citacademies.co.uk
		Trust central Team:		
		Director of Safeguarding	Becky Jackson	Becky.jackson@citacademies.co.uk
		Safeguarding Trustee	Paul Tallentire	Paul.tallentire@citacademies.co.uk
		DSL holiday cover	Amanda Locke	Amanda.locke@citacademies.co.uk
		Local Authority contact details:		
		Local Authority Contact information	For urgent safeguarding concerns	Non-urgent concerns:
			Leicestershire For urgent safeguarding concerns call First response childrens' duty team: 0116 305 0005	For non- urgent requests for support use the MARF Form: Multi-Agency Referral Form for Early Help and Social Care services (MARF) Leicestershire County Council Professional Services Portal

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		LADO	Phone contact Leicestershire 0116 3054141	Email cfs-lado@leics.gov.uk online form: Report a childcare worker or volunteer Leicestershire County Council
		Leicestershire Virtual School	0116 305 6097	virtualschool@leics.gov.uk
		Police	Emergency Non-emergency	999 101
4	Recognising, responding and recording	All staff at Foxfields Academy have a responsibility to recognise the signs and indicators of abuse, neglect and exploitation, and to act promptly when concerns arise. Any safeguarding concern must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL (DDSL). The school will respond to concerns in a timely, proportionate and child-centred manner, ensuring that appropriate action is taken to safeguard and promote the welfare of the child, including referrals to external agencies where necessary. At Foxfields Academy, all staff are trained to report concerns in the following way: All safeguarding concerns must be triaged by a member of the safeguarding team. Concerns should be reported within 15 minutes of disclosure and must not be emailed unless you have spoken directly with them first. The safeguarding team will then decide who will manage the concern within the team. Depending on the situation, you may be asked to complete a Record of Concern Form and/or speak with the student or contact parents. Details of any conversations (including date and time) must be shared with the safeguarding team so they can be logged on CPOMS.		

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		If members of the safeguarding team are N/A, please report your concern to one of the Senior Leadership Team who are all trained to DSL level. At Foxfields Academy, we have a culture of not leaving notes or sending emails with concerns as you do not know if this message has reached its intended person. Concerns MUST be reported face-to-face or by call within 15 minutes.
5	Family Help and Early help	This school is committed to identifying emerging needs and providing support at the earliest opportunity. Through our Family Help and Early Help processes, we work collaboratively with children, families and partner agencies to provide timely support, promote positive outcomes and prevent concerns from escalating. The school will contribute to assessments, plans and reviews where appropriate, ensuring that children receive the right support at the right time. When our safeguarding team identifies that a child or family would benefit from additional support, but the threshold for statutory social care intervention has not been met, then we will follow the Local Authority Family Help process. The Designated Safeguarding Lead (DSL) or DDSL will usually discuss concerns with the child and family, seek consent where appropriate, and work with relevant agencies to assess needs and coordinate support.
6	Child on child abuse	At this school we recognise that children can abuse other children and that such behaviour can occur both inside and outside of school, including online. We follow and adhere to the CIT Child-on-Child abuse Statement – Appendix 1 of this policy. Child-on-child abuse may include bullying, physical abuse, sexual violence, sexual harassment, harmful sexual behaviour, coercion, exploitation and online abuse. All allegations and concerns of child-on-child abuse where there is a deliberate intent to harm emotionally or physically will be recorded and reported as a safeguarding issue. These allegations will be taken seriously, investigated appropriately and addressed promptly, with support provided to all children involved and safeguarding measures put in place where necessary.

This is how we recognise and report child-on-child abuse:

- All staff will follow the Trust expectations to report child-on-child abuse as a safeguarding issue.
- Staff at Foxfields Academy are trained to report child-on-child abuse in the same way as a safeguarding concern.

This is how we respond:

- All reports of child-on-child abuse will be triaged and responded to by the safeguarding team.
- The appropriate response or sanction will be put in place in line with the school Behaviour Policy.
- Parents of the victim and perpetrator will be informed by the end of the school day.
- The team will analyse the data to check for patterns and trends and to ensure that the actions taken by staff have been timely, appropriate and effective.
- The team will make sure that the appropriate support is put in place for the victim.
- Safeguarding leaders will make sure that regular check ins are done to make sure that the behaviours have stopped and the victim feels safe.

We recognise that some children may find it difficult to talk about abuse that is happening within the school especially sexual abuse and harassment. We will ensure all children feel confident that their concerns will be taken seriously, and any disclosure will not be judged or seen to be minor. We will not wait until incidents occur but will be proactive in ensuring our children understand behaviours that are unacceptable and feel confident to report and be part of the solution to eradicate the behaviour within the school.

Responding to Harmful Sexual Behaviours:

The school recognises that harmful sexual behaviour (HSB) can occur between children of any age and will take all concerns seriously.

Children who are victims of HSB, sexual harassment or sexual violence wherever it happens, may find the experience stressful and distressing. This can adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

Any incidents or disclosures of harmful sexual behaviour will be responded to promptly, proportionately and in a child-centred manner, with the safety and wellbeing of all children involved being paramount. No report of HSB will go unchallenged or unchecked.

The school will follow statutory safeguarding guidance, assess risk, provide appropriate support and intervention, and work closely with parents, carers and external agencies where required to ensure children are protected and supported.

When a child discloses that they have been a victim of any form of HSB, we will ensure that we:

- Listen and assure them that they are being taken seriously.
- Treat abuse that occurs online or outside the school or college environment with equal seriousness
- Never promise confidentiality.
- Recognise that an initial disclosure may not reflect the full extent of abuse, and that trauma can impact memory meaning details may be affected.
- listen carefully to the child, reflecting back, using the child's language, avoiding judgement, being clear about boundaries and how the report will be progressed, and asking only open-ended questions.
- Ideally, staff should wait until the end of the conversation to write a detailed summary, allowing the staff member to give the child their full attention. If notes are taken during the report, especially when a second staff member is present, care must be taken to remain engaged and not appear distracted. It is essential a written record is made as per Part 1 of this policy.
- record only what the child says, without interpretation or opinion. These notes may be used in statutory assessments and/or criminal investigations
- Inform the DSL or DDSL as soon as practically possible – ideally within 15 minutes.

Then, the DSL will:

- Consider informing parents or carers, unless doing so increases the risk to the victim,
- Consider referring to local authority children's social care if the child is at risk of harm, in immediate danger, or has been harmed, and
- Report crimes such as rape, assault by penetration or sexual assault to the police.
- Carry out an immediate risk and needs assessment as set out in KCSiE 2026 para 565

Responding to Serious Violence:

This school recognises that involvement in serious violence, including knife crime, may be a sign that a child is at risk of harm, exploitation or criminal abuse.

Staff are trained to recognise indicators of serious violence, such as increased absence, changes in friendships, unexplained injuries, possession of weapons, or involvement in criminal activity.

KCSiE 2026 highlights that staff should be aware of indicators which may include:

- Increased absence from school.
- Changes in friendships or relationships with older individuals or groups.
- Unexplained gifts, money or possessions.

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		• Signs of assault or unexplained injuries. • Carrying weapons. • Involvement in anti-social behaviour or criminal activity. • Possible links to child criminal exploitation or county lines. Any concerns will be reported to the Designated Safeguarding Lead (DSL) without delay and responded to in accordance with safeguarding procedures, including referrals to Children's Services, the Police and other relevant agencies where appropriate. The school will work proactively with partners to help identify risks, provide support and reduce the likelihood of children becoming involved in serious violence. All information received, actions take, conversations and check ins that happen after a report of child-on-child abuse will be recorded on CPOMS.
7	Low level concerns –	This school promotes a culture of openness and transparency where all concerns about the behaviour or conduct of adults working with children are taken seriously. In line with the CIT Low Level Concerns Policy and its definitions, all staff must report any low-level concern, no matter how small, to the Headteacher as soon as possible. Staff have been trained to report to the Headteacher either face-to-face or if that is not possible via phone call to the Headteacher's work mobile. All concerns will be recorded, reviewed and managed appropriately to help ensure that children are safeguarded and that professional standards are maintained. If the concern is about the Headteacher, then the Director of Education (James Ellis) will be notified – james.ellis@citacademies.co.uk
8	Concerns that meet harm threshold	This school recognises that some concerns relating to adults working with children may meet the harm threshold and require immediate action. Any allegation or concern that a member of staff, volunteer or other adult may have harmed a child, committed a criminal offence against a child, behaved in a way that indicates they may pose a risk to children, or behaved in a way that may impact their suitability to work with children, will be reported and managed in accordance with statutory guidance.

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		Headteachers will ensure that these allegations are referred without delay to the Local Authority Designated Officer (LADO) and dealt with fairly, consistently and in a manner that safeguards the welfare of children. Any investigation into an allegation of harm to a child will be done in accordance with the CIT Trust Policy: Allegations-of-Abuse-Made-Against-Staff-Policy-Summer-2026.pdf.
10	How we work with external agencies	This school recognises that safeguarding children is a shared responsibility and is committed to working closely with external agencies to promote the welfare and safety of all pupils. Where concerns arise, the school will work in partnership with Children's Services, Health professionals, the Police, Family and Early Help services and other relevant agencies to ensure that children and families receive appropriate support and protection. Information will be shared in a timely and lawful manner, with the child's best interests remaining at the centre of all decision-making. We recognise the important role of the Virtual School Headteacher in promoting the educational achievement, attendance, wellbeing and safeguarding of children in care and previously looked-after children. We will work collaboratively with the Virtual School, carers, parents and relevant agencies to ensure that appropriate support is in place and that the needs of these children are identified and addressed effectively.
11	DSL cover	<i>To ensure continuity of safeguarding responsibilities, schools should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. Schools and colleges have the flexibility and discretion in how these arrangements operate, provided safeguarding responsibilities remain appropriately covered. It would be good practice that, whenever the DSL is unavailable, there is a clear, reliable, and known arrangement in place so that concerns can be raised. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay. KCSiE 2026</i> This school has a named DSL and extensive number of Deputy DSLs. In the absence of the DSL the DDSLs will provide operational cover as they are trained at the same level.

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		Where capacity is reduced and neither is available, the Trust central DSL will be named as the DSL and will assume the role either on site or remotely. During school holidays, safeguarding arrangements will be put in place to ensure children can access support where needed. The Designated Safeguarding Lead (DSL) will liaise with the central safe@CIT team to notify them where there is a need to provide appropriate cover throughout holiday periods, and they will then be available to respond to safeguarding concerns. Staff, families and external agencies will be provided with relevant contact details where appropriate. Any safeguarding concerns that arise during school closure periods will be managed in line with statutory guidance, with referrals to Children's Services, the Police or other relevant agencies made without delay where a child is at risk of harm.
12	Curriculum	This school is committed to helping pupils develop the knowledge, skills and resilience needed to keep themselves safe throughout their lives. Through a broad and balanced curriculum, including Relationships, Sex and Health Education (RSHE), online safety, citizenship and wider safeguarding education, pupils are taught how to recognise risks, make informed decisions, build healthy relationships and seek help when needed. This supports pupils to become safe, confident and responsible members of society. We aim that as well as teaching children how to keep safe, our curriculum prepares pupils and for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. All children in our school are regularly reminded that they can approach any member of staff if they have a concern. The school is committed to ensuring that children are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All children know that we have a senior member of staff (DSL) with responsibility for child protection and safeguarding and know who this is. We inform children of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm. We use a wide range of organisations and resources as part of our PSHE and Relationships Education to help children learn how to keep safe. In addition to this we make use of opportunities in other curriculum areas to discuss safeguarding topics, so pupils are constantly reminded.

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	We have a separate RHSE Policy which is compliant with the 2026 statutory guidance Relationships Education, Relationships and Sex Education and Health Education guidance. This policy details how and what will be taught as part of our RHSE curriculum. The following areas are among those addressed in PSHE and Relationships Education, Relationships and Sex Education and Health Education and in the wider curriculum and these will be tackled at age-appropriate stage and content: • Bullying (including Cyberbullying) • Drugs, alcohol and substance misuse (including awareness of County Lines and the Criminal Exploitation of children where appropriate) • Online safety • The danger of meeting up with strangers • Fire and water safety • Road safety • Healthy and respectful relationships / boundaries and consent • (so called) Honour Based Abuse issues e.g. forced marriage, Female Genital Mutilation • Sexual exploitation of children (CSE), including online • Child criminal exploitation (including cybercrime) • Preventing Extremism and Radicalisation • Stereotyping, prejudice and equality • Misinformation and disinformation • Misogyny • Body confidence and self-esteem • How to recognise an abusive relationship, including coercive and controlling behaviour • The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape • What constitutes sexual harassment and sexual violence and why these are always unacceptable. Our curriculum design recognises and reflects the contextual safeguarding priorities set out in paragraph 1 of Part 2 of this policy. As well as the planned curriculum, staff here are responsive to issues that arise such as the use of racist or homophobic language, misogyny, bullying etc. additional curriculum materials will be used to support pupils and address behaviours and attitudes as part of the planned response. Preventative Education Curriculum
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		As stated in paragraph 24.3 of Part 1 of this policy, we will ensure that pupils access a preventative curriculum that supports them being able to recognise risk and keep themselves safe at an age, stage and ability appropriate level. The preventative education curriculum is designed to equip pupils with the knowledge, skills and understanding necessary to keep themselves safe and to promote their wellbeing. Through Relationships Education, Health Education, online safety education, assemblies, pastoral support and wider curriculum opportunities, pupils will learn about personal safety, healthy relationships, consent, respectful behaviour, online risks, mental wellbeing, bullying, discrimination, equality, diversity, extremism, exploitation, substance misuse, physical health and how to seek help when concerned about themselves or others. The curriculum is progressive, age-appropriate and responsive to local and emerging safeguarding risks, enabling pupils to develop resilience, make informed decisions and become safe, responsible and respectful members of society. Our school RHSE policy is published on our website. We have consulted parents about its content before this was published. The correct RHSE and safeguarding curriculum content is available on our school website.
13	Online Safety	This school recognises that technology plays an important role in children's lives and is committed to helping pupils stay safe online. Through an age-appropriate curriculum, effective filtering and monitoring systems, and clear safeguarding procedures, pupils are taught how to use technology safely, responsibly and respectfully. This school aims to work in partnership with parents, carers and external agencies where appropriate to promote online safety and respond effectively to any concerns relating to online abuse, exploitation or harmful content. If any pupils use online technologies or AI to harass or bully other children, the school will follow procedures outlined in our Behaviour Policy. All our staff receive training about supporting pupils to keep safe online as part of the CIT 3 Year Pathway.
14	Collecting and listening to the views of children	It is important to us at Foxfields Academy that all children feel heard and understood. Therefore, we aim to create a culture where we: • Listen to children and take account of their wishes and feelings, • Gather their views in ways that means they can share with us, as not all pupils are able or confident to speak

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		- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication. - Make sure all children know who they can talk to if they have a concern and support them to feel the confidence to be able to do so. We will do this through: Surveys to capture pupil voice Excellent positive working relationships with children and expert knowledge of them as individuals Actively gather pupil feedback and consider actions Student council
14	Filtering and monitoring	The school has appropriate filtering and monitoring systems in place to help safeguard pupils when using school technology and internet-enabled devices. These systems are designed to reduce the risk of children accessing harmful or inappropriate content, while supporting teaching and learning. Filtering and monitoring arrangements are regularly reviewed to ensure they remain effective, proportionate and in line with statutory safeguarding requirements. Our filtering system is provided by Securely, supported by Senso Cloud. Securely filtering is compliant with: · KCSIE 2026 · National Centre for Cyber Security (NCSC) · Internet Watch Foundation Member · Prevent Duty Strategy · Counter Terrorism Internet Referral Unit (CTIRU) Online filter list The effectiveness of the systems is audited by the central IT team and reported to the Trust Board. If the filtering system is breached, we have the following systems in place: Where pupils have deliberately and with clear intent tried to search for inappropriate or concerning material, this will be treated as a safeguarding concern and reported on CPOMS as soon as possible. School safeguarding leaders will need to assess the nature of the intent and consider the appropriate and proportionate response.
14	Organisations using school premises and extended school activities	Where school premises are used by external organisations or individuals, the school will seek assurance that appropriate safeguarding arrangements are in place to protect children as detailed in Para 27 in Part 1 of this policy. External providers are expected to comply with relevant safeguarding requirements, including safer recruitment, staff suitability checks and child

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		protection procedures. The school will work with providers to ensure that the welfare and safety of children always remain paramount.
15	Other relevant school policies	These are our school policies. Central CIT Policies are detailed in Para 30 in Part 1 of this policy. Supporting Pupils with Medical Conditions Allergy Awareness RHSE Behaviour Policy Suspensions and Exclusions Policy Restrictive Interventions Policy SEND Policy
16	Complaints	This school takes all complaints relating to safeguarding and child welfare seriously and will respond to them promptly, fairly and in accordance with our school and Trust complaints procedures. Concerns relating to the safety or wellbeing of a child will be addressed as safeguarding matters and, where necessary, referred to appropriate agencies. The school is committed to ensuring that all complaints are handled sensitively, transparently and with the best interests of children at the centre of decision-making.
17	Monitoring and Review	The central team at CIT will be responsible for the review of Part 1 of this policy annually. The DSL will review Part 2 of this policy annually.

Appendices:

Page	Appendix number	Appendix title
	1	Child-on-Child Abuse – Trust definition
	2	Low Level Concerns Trust-wide Policy
	3	Signs and Symptoms of Abuse Booklet
	4	Local Safeguarding Arrangements

Appendix 1:

Child-On-Child Abuse Trust Definition and Expectations

When a child or a group of children abuse/s another child, it is defined and named as child-on-child abuse.

KCSiE 2026 states that: *All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.*

Child-on-child abuse refers to any form of harm, exploitation, or abuse that occurs between children or young people. This can happen within or outside the school environment and may involve individuals of the same age or differing developmental stages.

The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.

We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Abuse can be one single incident or a series or pattern of incidents.

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

- Bullying (including cyberbullying).
- Prejudice and Discriminatory Behaviours.
- Abuse in intimate personal relationships between children (also known as teenage relationship abuse),
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
- Physical assault and harm, or the threat of harm with a weapon,
- Harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- Consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- Upskirting (which is a criminal offence⁴⁴), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm,
- Initiation/hazing type violence and rituals.

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(a fuller and more comprehensive list of identified child-on-child abuse behaviours can be found in para 34 of KCSiE 2026).

All staff in school must be made aware, as part of the ongoing Trust 3-year training pathway that children can and do abuse other children.

The scope of this ongoing learning will cover incidents that happen both inside and outside of school or college as well as online.

We will ensure that through our training, policy and ongoing practice that our staff are able to recognise the signs of child-on-child abuse and know with confidence how the school and the Trust expects them to respond. This includes the understanding that although incidents might not be reported it is a high likelihood that it may well be happening for some of our pupils. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their DSL (or deputy).

As part of our duty to support all our pupils - as well as knowing how to recognise behaviours and indicators of risk as early as possible, staff should know that timely, evidence-based support can be key to preventing children from going on to commit further abuse or violence. We do this by recognising, reporting and responding so leaders can use this information to further build a picture of a child and take the appropriate action.

Reporting allegations of child-on-child abuse:

When staff have any concerns regarding child-on-child abuse, they should report this immediately to their DSL (or deputy) and report it on CPOMS as soon as practicable as set out in the Reporting section of the Safeguarding and Child Protection Policy.

When recording on the school system, the correct categorisation of abuse must be assigned- it must be tagged as 'Safeguarding'. If in any doubt, the member of staff reporting should seek advice from the DSL.

When they witness or have child on child abuse reported to them, it is essential that all staff understand the importance of challenging inappropriate behaviours between peers that are abusive in nature.

Staff will be trained effectively so that they know not to downplay certain behaviours, for example we must avoid dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Children also need to know how to report concerns and know that they will be listened to and supported.

These should include:

- Procedures to minimise the risk of child-on-child abuse
- How allegations are recorded, investigated and dealt with

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- Clear processes as to how victims, perpetrators and any other children affected will be supported
- Recognition of the gendered nature of child-on-child abuse but recognising, that all forms of this behaviour are unacceptable and will be taken seriously.

All incidents of child-on-child abuse must be reported as a safeguarding issue and be triaged and assessed by the safeguarding team.

Leaders must analyse information to identify trends and patterns in behaviours to ensure the understanding of when single or isolated incidents tip over into more regular bullying behaviours.

Useful Definitions – all of these are safeguarding issues (KCSiE 2026) and must be designated on CPOMS to be seen by the school safeguarding team.

<u>Child-on-child abuse</u>	<u>Bullying</u>	<u>Harmful Sexual Behaviours (HSB)</u>	
		<u>Sexual Harassment</u>	<u>Sexual Violence</u>
Any incident (using the KCSiE 2026 list as guidance) where staff professionally judge there was intent to harm. These can include: Bullying Abuse in teenage relationships Physical (kicking, hitting, shaking, biting, hair pulling, spitting) Prejudice and discriminatory abuse Serious physical assault including the threat of a weapon Sexual harassment Sexual violence Consensual and non-consensual sharing of self-generated intimate images including AI Upskirting Initiation/hazing and rituals	When abusive behaviours (any) become repeated and targeted over several times. This is including physical, emotional, cyber and prejudice-based/discriminatory language. Bullying can only be evidenced if individual incidents are logged and analysed.	Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school. sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names, • physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes.	These behaviours include: • Rape • Sexual assault • Causing someone to engage in sexual activity without consent

All reports of child-on-child abuse will be assessed on a case-by-case basis as to their nature, intent and severity of the event, with the DSL or their deputy taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.

Any child-on-child bullying incidents that are discriminatory or prejudice-based and have any motivation against pupils with protected characteristics or that relate to people with protected characteristics will be reported as safeguarding and investigated as race/hate incidents.

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When child-on-child abuse has been identified and recorded and reported, leaders must ensure that the correct actions are taken.

This will be proportionate to the incident and in line with other key policies such as the Behaviour Policy and the anti-bullying statement.

All actions taken must be recorded on CPOMS.

Leaders must record how they analyse the patterns emerging in behaviours to identify where child-on-child might be becoming targeted and persistent, so that effective actions can be taken.

Leaders are required to analyse the impact of actions taken so that effectiveness can be measured.

The absence of previous reports does not mean that any form of abuse is not occurring.

Vulnerable groups

We recognise that all children can be at risk of abuse, however we acknowledge that some groups are more vulnerable.

This can include:

- Experience of abuse within their family
- Children living with domestic violence
- Young people in care;
- Children who go missing;
- Children with additional needs (SEN and/or disabilities);
- Children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010.

Whist research tells us girls are more frequently identified as being abused by their peers and, girls are more likely to experience unwanted sexual touching in schools this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where gangs affect them. We recognise that both boys and girls experience child on child abuse, but they do so in gendered ways.

In our specialist schools, sometimes pupils contact each other for a range of reasons and situations. The Trust expects that schools identify and categorise behaviour as child-on-child abuse when staff professionally judge that there was a wilful intent from the perpetrator to harm another child – the victim.

This requires staff to build knowledge of pupils, profile their behaviours and understand the best way of gaining pupil voice from both perpetrator and victim to understand the behaviours behind the incident.

It is important to build a clear understanding of patterns of behaviour, using the school recording/reporting systems so that staff can continually build the ongoing picture of a pupil.

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The response to behaviour and how it is triaged and then actioned will be driven by accurate assessment of intent – and will be handled after this by the relevant behaviour or safeguarding team.

When child-on-child abuse becomes bullying:

Bullying is always recorded as a safeguarding concern. The Trust is very aware that it has a detrimental impact on young people's mental health and their ability to thrive at school. Bullying can affect a child's attainment and wellbeing.

We are clear that all forms of bullying, for whatever reason, are unacceptable. Schools must take a strong, proactive stand against all forms of bullying, and schools and colleges should tackle bullying at the earliest opportunity to prevent it from escalating.

All CIT schools should show evidence in their CPOMS chronologies of all actions taken when bullying is identified including actions taken, sanctions, conversations with parents, curriculum provision, any suspensions or exclusions. Leaders must show how they have analysed the impact of the actions they have taken,

Harmful Sexual Behaviour

The Trust recognises that harmful sexual behaviour (HSB) can occur between children of any age and stage of development and will take all reports, concerns and allegations seriously. Harmful sexual behaviour exists on a continuum and may include inappropriate sexual language, unwanted sexual touching, sexual harassment, sexual violence, online sexual abuse, coercive behaviour and other behaviours that are developmentally inappropriate or harmful to others. Schools within the Trust will maintain a culture where such behaviour is never tolerated, dismissed as banter, part of growing up, or accepted as normal.

Staff will report concerns without delay to the DSL via CPOMS and staff should follow this up with a verbal conversation to ensure it is a priority.

All concerns relating to harmful sexual behaviour will be triaged and assessed by the school safeguarding team and will be responded to promptly, proportionately and in a child-centred manner. The DSL will consider the nature of the incident, undertake appropriate safeguarding actions, and make referrals to Children's Services, the Police or other agencies as required.

The immediate safety, welfare and needs of the child who may have experienced harm will be prioritised, whilst ensuring appropriate support, intervention and risk assessment for all children involved.

The Trust will expect that all schools ensure that decisions are informed by the wishes, feelings and lived experiences of the children involved and that appropriate measures are implemented to prevent any recurrence.

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All CIT schools will provide an age and stage appropriate RHSE curriculum (compliant with statutory guidance) that promotes healthy relationships, respectful behaviour, consent, boundaries and online safety, helping to prevent harmful sexual behaviour and fostering a culture of respect and safeguarding.

All incidents will be recorded and managed in accordance with statutory guidance, including *Keeping Children Safe in Education 2026* pages 124 to 154.

Key Steps for all CIT Schools when managing an allegation of HSB.

- Listen and reassure
- Take the disclosure seriously.
- Provide a calm, supportive response.
- Avoid asking leading questions.
- Reassure the child that they have done the right thing by speaking up.
- Make a clear, factual and contemporaneous record of the disclosure, including the child's own words where possible.
- Report to the DSL immediately - All concerns must be passed to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay.

The DSL will need to:

- Ensure immediate safety
- Assess whether any child is at immediate risk of harm.
- Put appropriate safeguarding measures in place to protect all children involved.
- Consider whether children need to be separated while the incident is being assessed.
- Record accurately
- Undertake a risk and needs assessment
- The DSL should consider the nature of the incident, ages of those involved, power imbalances (Brooke Traffic Light), vulnerability factors, ongoing risks and support needs.
- Assess whether a formal risk assessment may be required.
- Consider referral - The DSL should determine whether the matter requires referral to Children's Social Care and/or the Police. Where a child may be suffering or likely to suffer significant harm, a referral must be made promptly.
- Support all children involved
- Provide ongoing support to the child who experienced the behaviour (the victim)
- Consider the welfare and support needs of the child displaying the behaviour, recognising that they may also have safeguarding needs.
- Work with parents and external agencies
- Inform and involve parents/carers where appropriate and safe to do so.
- Work collaboratively with Children's Services, Police, Health and other professionals.
- Monitor and review.
- Review support plans, risk assessments and safeguarding measures regularly.
- Ensure any actions taken remain effective and proportionate.
- Record everything.

Information and strategies for dealing with many aspects of child-on-child abuse appear in other school and Trust policies such as the whole school behaviour policy, the anti-bullying policy and the Safeguarding and Child Protection Policy.

Action following a report of sexual violence and/or sexual harassment:

The school will use KCSiE 2026 paras 527 - 646 as guidance for dealing with issues relating to sexual violence and harassment.

Following an incident, we will consider the wishes of the victim in terms of how they want to proceed – if this is age, stage and developmentally appropriate. This is especially important in the context of sexual violence and sexual harassment.

What was the explanation by all children involved of what occurred?

Can each of the young people give the same explanation of the incident and what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour.

The ages of the children involved.

How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, 1-4-year-olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however, should not be overlooked if other issues arise

The developmental stages of the children involved; the children's own understanding of what occurred?

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person understand the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether there is any risk involved, please seek advice from Children's Services Social Care.

Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

If the alleged incident is a one-off or a sustained pattern of abuse.

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

Are there ongoing risks to the victim, other children, adult students or school staff, and other related issues and wider context?

Where did the incident or incidents take place?

Was the incident in an open, visible place to others? If so, was it observed? If not, is more supervision required within this area?

As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

Options to manage the report

Manage internally

1. In some cases of sexual harassment, for example, one-off incidents, leaders may decide that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, through utilising the behaviour and bullying policies and by providing pastoral support.

This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored (by whom, where).

2. In line with 1 above, leaders may decide that the children involved do not require statutory interventions but may benefit from Family Help. This means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Family or Early Help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

3. Where a child has been harmed, is at risk of harm, or is in immediate danger, schools will make a referral to the relevant local authority body following locally agreed protocols. Where statutory assessments are appropriate, the designated safeguarding lead or a deputy will be working alongside, and cooperating with, the relevant lead social worker.

Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

Reporting to the Police

The DSL and their deputies) will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains.

Where a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, the school will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought to help this.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, school leaders must work closely with the police (and other agencies as

required), to ensure any actions the school takes do not jeopardise the police investigation. The end of the criminal process If a child is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all children. Then, consider any suitable action following our behaviour policy. If the perpetrator remains in school leaders will need to be very clear as to the expectations regarding the perpetrator now, they have been convicted or cautioned.

All pupils at school need to be protected while this individual is on site and any restrictions leaders think are reasonable and proportionate about the perpetrator's timetable should be put in place. Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school or college, therefore leaders will ensure all children involved are protected, especially from any bullying or harassment (including online).

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

Support for Children Affected by Sexual-Assault

Support for victims of sexual assault is available from a variety of agencies. In all CIT schools, we expect leaders to ensure that they support the victim of sexual assault to remain in school but if they are unable to do so we will enable them to continue their education elsewhere.

This decision will be made only at the request of the child and their family. If they are moved, we will ensure the new school is aware of the ongoing support they may need. The DSL will support this move. Where there is a criminal investigation, the alleged perpetrator will be removed from any shared classes with the victim, and school leaders will also consider how best to keep them a reasonable distance apart on the school premises or on school transport.

This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings.

Schools will work closely with the police where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, so leaders are able to take suitable action, if not already done so.

In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where a criminal investigation into sexual assault leads to a conviction or caution, school leaders may, if not already done so, consider any suitable sanctions using the behaviour policy, including consideration of permanent exclusion.

Where the perpetrator is going to remain at the school, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most

appropriate way to manage potential contact on school and college premises and transport.

The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict.

None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator.

Appropriate support will be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis.

All the above will be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

Physical Abuse While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police immediately. The principles from the school anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

Commented [BJ1]: Please amend this to show the name of the policy where you have your anti-bullying statement. This might be in your Behaviour policy for example)

Appendix 2 – Low Level Concerns Policy



Low Level Concerns Policy

Policy Code:	SG4a
Policy Start Date:	September 2026
Policy Review Date:	September 2027

Statement of Intent

The Community Inclusive Trust understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity.

We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our Trust prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils.

The Trust has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE 'Keeping Children Safe in Education' the current document
- DfE 'Working Together to Safeguard Children'

This policy operates in conjunction with the following Trust and school policies:

- The CIT Trust-wide Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Restrictive Interventions Policy
- Allegations of Abuse Against Staff Policy
- Whistleblowing Policy
- Data Protection Policy

2. Definitions

For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting.

Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the appropriate and inappropriate behaviour subsection of this policy.

Low-level concerns are differentiated from concerns that can cause harm.

The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child.

This threshold is defined as accusations that an adult 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 that they pose or may pose a risk to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the Trust understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children.

The Trust expects that all schools ensure that all staff and volunteers are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

3. Roles and responsibilities

3.1 The Trust Board is responsible for:

- Ensuring that the Trust complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures and training opportunities about reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained Designated Safeguarding Lead (DSL) has been appointed at each school, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

3.2 The Director of Safeguarding is responsible for:

- Monitoring and reviewing this policy.
- Providing training on managing low-level concerns to Headteachers and DSLs.
- Providing advice and guidance to Headteachers and DSLs on the management of reported concerns as appropriate.
- Monitoring the application of this policy within each school.
- Conducting school audits on the reporting, recording and management of low-level concerns to ensure compliance with this policy.

3.3 The Headteacher is responsible for:

- Ensuring that all staff receive the appropriate full CIT induction, including reading and understanding the policies and documents set out in the CIT 3 Year Safeguarding Training Pathway.
- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.

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- Ensure the secure recording of the concerns and any subsequent actions taken.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Monitoring the trends and patterns in these concerns and assessing whether there is a wider issue that needs dealing with in accordance with CIT HR policies.
- Report the number of low-level concerns to the LSB and any trends or patterns.
- Implementing this policy, and all related policies, throughout their school, and ensuring that staff always adhere to it.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff within their school have undertaken safeguarding training.
- Ensuring that all staff within their school have an ongoing awareness of low-level concerns and reporting procedures.

4. Staff (including the DSL) are responsible for:

- Adhering to all the relevant policies and procedures, including always acting within the CIT Staff Code of Conduct.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting all safeguarding concerns, they may have about pupils immediately.
- Reporting all safeguarding concerns, they may have about the behaviour of a member of staff immediately.

5. Prevention amongst staff - Appropriate and inappropriate behaviour

The Trust will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour regarding pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Headteacher immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse.

Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Headteacher may include (but are not limited to):

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- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on their personal mobile phones or devices.
- Seeking to engage with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating pupils.
- Covering viewing panels in a classroom door against guidance.

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the CIT Staff Code of Conduct.

The Headteacher will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort where low-level concerning behaviour is seen more widely.

6. Strong Safeguarding and reporting Culture

The Trust expects that all CIT schools promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The Trust expects that all schools will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the appropriate and inappropriate behaviour subsection of this policy, as well as the Staff Code of Conduct.

The Trust will support schools to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in our school communities, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The Trust will expect school leaders to ensure that all staff are sufficiently trained regarding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The Trust will expect school leaders to ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

The Trust will ensure that appropriate consideration is given to the Trust and School's culture and whether it has enabled the inappropriate behaviour to occur. The Director of Safeguarding will review whether any changes need to be made to relevant policies or training programmes considering any evaluations of the Trust or school's culture, to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

7. Reporting concerns

Staff will report all concerns they have to the Headteacher immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report their concerns to the Headteacher using the agreed method set out in Part 2 of the Child Protection and Safeguarding Policy. When submitting concerns, staff will take care to ensure that they observe the Allegations of Abuse Against Staff Policy.

Staff members may request anonymity when reporting a concern and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Headteacher, it should be reported to the appropriate Director of Education or Deputy, Director of Safeguarding or Director of HR.

Where a low-level concern relates to a member of the central team, it should be reported to their line manager or the Director of Safeguarding or HR.

Where a low-level concern relates to the CEO or a member of the Executive Leadership Team (ELT), it should be reported to the Chair of the Trust Board.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school, staff will also be required to report this to the Headteacher, who will in turn inform the employer of the subject of the concern.

2. Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

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- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the CIT Staff Code of Conduct.

In these cases, they will need to report this to the Headteacher themselves. This is known as self-reporting.

The Trust will ensure that CIT schools foster an environment that encourages staff members to self-report if they feel as though they have acted inappropriately, or in a way that could be construed as inappropriate upon reflection. The Headteacher will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

However, staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; but their self-awareness and intentions will be taken into consideration.

3. Evaluating concerns

Where the Headteacher is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level, or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Headteacher will discuss the concern with their Director of Education and seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold.

When seeking external advice, the Headteacher will ensure they adhere to the Data Protection Policy and the information sharing principles outlined in the Child Protection and Safeguarding Policy at all times.

To evaluate a concern, the Headteacher will:

Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.

Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.

Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.

Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.

Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.

Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

4. Acting on concerns where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Headteacher will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future.

The Headteacher will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with Trust standards and the law. The Headteacher will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Headteacher will assess whether the behaviour and the reporting of this behaviour is indicative of ambiguity in the Trust or school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the Headteacher will work together with the Director of Education to resolve this with input from other staff members as necessary.

Where the Headteacher determines that a concern is low-level but requires addressing, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

A meeting will be held with the individual about whom the concern was reported, during which they will:

- Talk to the individual in a non-accusatory and sympathetic manner.
- Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
- Clearly state what about their behaviour was inappropriate and problematic.
- Discuss the reasons for the behaviour with the individual.
- Inform the individual clearly what about their behaviour needs to change.
- Discuss any support that the individual may need to achieve the proper standards of behaviour.
- Allow the individual the opportunity to respond to the concern in their own words.

The individual will need to re-read the Staff Code of Conduct.

The Headteacher will consider whether the individual should receive guidance, supervision or any further training.

Where considered appropriate in the circumstances, the Headteacher will develop an action plan with input from the individual that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.

Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.

Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support where appropriate.

The Headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Records Management Policy and the Data Protection Policy. The Headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period, the concerns will be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy.

The Headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated and dealt with as an allegation. The Headteacher will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

11. Record keeping

Headteachers will retain all records of low-level concerns related to their individual schools, including those that were found to be unfounded.

The Headteacher will ensure that all records include the most accurate and up-to-date information and will store them according to the system that is in place for recording safeguarding concerns in their school, i.e. CPOMS Staff-safe or similar agreed system. The Headteacher will ensure that all low-level concerns are stored together in an organised and consistent manner to ensure they can be easily reviewed and analysed where necessary.

The Director of Safeguarding will maintain records of any Central Team low-level concerns, as well as any concerns relating to Headteachers.

Record of any low-level concerns concerning members of the ELT will be maintained by the Clerk to the Trust Board.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The Director of Safeguarding and the Headteacher will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort.

Where any concerning patterns of behaviour have been identified about a member of staff, the Headteacher will decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon

as practicable. It should be considered whether there are any wider cultural issues within the Trust/school that enabled the behaviour to occur and, where appropriate, policies including this one could be revised or extra training provided to staff to decrease the risk of it happening again.

Records of any outcomes from low-level concerns will be kept in the personnel file of the individuals to whom the concerns pertain. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of allegation.

The Headteacher will ensure that all records are kept in a manner that is consistent with the Data Protection Policy.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold.

11. Monitoring and review

- 11.1 This policy will be reviewed annually by the Director of Safeguarding and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the Trust.

Low Level Concern Reporting Form (For use if school does not use Staff-Safe from CPOMS)

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Headteacher. Please refrain from discussing this concern with anyone other than the Headteacher until the matter has been dealt with. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.

Your details		
Name (optional)		
Role		
Date and time of completing this form		
Details of individual whom the concern is about		
Name		
Role		
Relationship to the individual reporting the concern, e.g. manager, colleague		
Details of concern		
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?		
Details of any children or young people involved		
Name(s)		
Do you believe there is a risk of harm to the above children or young people, either now or in the future, because of the individual's behaviour? Explain your answer.		
Next steps		
What would you like to see happen in response to your concern?		
Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you believe is relevant to the processing of this concern.		
Signature		

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For use by safeguarding team upon receipt of concern

Date and time concern received	
Signature of Headteacher	
Actions to be taken, e.g. no action, investigation, reclassification as allegation meeting the harms threshold.	

Appendix 3 – Signs and Symptoms of Abuse Booklet



Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. This abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse.

They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships. Domestic abuse affects all of which can have a detrimental and long-term impact on their health, self-esteem, development, and ability to learn.

Domestic abuse can manifest in many ways – physical, emotional, psychological and behavioural. Recognising the signs is crucial for offering support or seeking help. There are the key signs and symptoms of domestic abuse, as all sometimes see these in a partner or as well as in a child. This is why this list includes adult signs as well as those that would be present in a child. When children are present around domestic abuse, they are still considered a victim, even if they show no physical injury.

Physical Signs

- Frequent injuries: bruises, black eyes, sprained wrists, or marks on the neck
- Unexplained or poorly explained injuries
- Wearing concealing clothing: long sleeves or scarves in hot weather to hide marks
- Heavy makeup or nailpolishes: indicates to cover bruises

Emotional and Psychological Signs

- Fear of partner or parent, or walking on eggshells around them
- Depression, anxiety attacks, or emotional numbness
- Low self-esteem or feelings of worthlessness
- Sensitivity to rejection or abandonment
- Lack of trust in others
- Not wanting to go home

Behavioural Signs

- Isolation from friends, family, or social activities
- Frequent absences or lateness at work or school
- Substance abuse as a coping mechanism
- Poor relationships or difficulty maintaining them
- Inability to work or concentrate
- Clings to a parent, or a member of staff
- Flinching or shying away from physical contact

Controlling or Manipulative Partner Behaviour

- Monitoring communications or interactions
- Restricting access to money, transportation, or social contact
- Verbal abuse, threats, or humiliation
- Sexual coercion or assault
- Gaslighting or making the victim doubt their reality

Signs and Symptoms of Abuse – September 2026

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

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an individual's power to control, manipulate or exploit a child who taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, such as gifts, money, drugs or attention, sexual activity, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been most commonly referred to as trafficking for the purpose of exploitation.

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

Children can become trapped as perpetrators can threaten violence (and their families) with violence or arrest and abuse from the state. They may be coerced into carrying weapons such as knives or bags to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often control access themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Child sexual exploitation (CSE) is a form of child sexual abuse.

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing.

It may include non-physical activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

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

Signs and Symptoms of Abuse – September 2026

CCE/CSE Ctd...

Key Signs and Symptoms of Child Sexual Exploitation

Behavioural Changes

- Sudden mood swings or emotional outbursts
- Increasingly disruptive or aggressive behaviour
- Withdrawal from family and friends
- Avoiding school or dropping out, leaving school after registration, lunchtime etc
- Being picked up from school by 'boyfriend'

Physical Indicators

- Unexplained injuries or bruises
- Signs of substance misuse
- Suffering from sexually transmitted infections (STIs)
- High value items suddenly appear in their possession such as phones, jewellery, clothing etc

Social and Environmental Clues

- Hanging out with older individuals or a new group of friends
- Having an older boyfriend or girlfriend
- Being seen in known CSE hotspots or unfamiliar homes
- Reports of being taken to hotels or entering vehicles with unknown adults

Technology and Communication

- Coerced or secretive use of social media
- Possession of multiple mobile phones
- Receiving rewards for introducing peers to certain adults

Behaviour

- Engaging in risky or unhealthy sexual behaviour
- Sexualised role-taking or inappropriate
- Knowledge of sexual matters

Emotional and Psychological Signs

- Experiences of despair or hopelessness
- Fear of specific people or places
- Low self-esteem or self-negligence

Signs and Symptoms of Abuse – September 2026

The lists of behaviours in this booklet are not exhaustive, but they support all school staff to have strong professional curiosity and become more observant of behaviour changes.

All concerns or changes that could indicate any area of abuse must be shared with safeguarding leads at school.

Your information could be that one vital missing piece of the puzzle that helps a child escape abuse.



Signs and Symptoms of Abuse – September 2026

Appendix 4 – Local Authority Procedures

All local authorities represented across the Trust are listed here in case pupils come to school across county boundaries.

Leicestershire	For Leicestershire, the local authority safeguarding procedures are provided through the Leicestershire and Rutland Safeguarding Children Partnership (LRSCP) and form part of the joint Leicester, Leicestershire and Rutland (LLR) Safeguarding Children Partnerships Procedures Manual. These procedures set out how agencies should work together to safeguard and promote the welfare of children in line with <i>Working Together to Safeguard Children 2026</i>. Thresholds and Early Help Leicestershire uses the LLR Thresholds for Access to Services for Children and Families to help practitioners determine: Universal support Early Help intervention Targeted support Statutory Children's Social Care involvement Child Protection intervention Reporting a Safeguarding Concern Where there is concern that a child is suffering or likely to suffer significant harm: Contact Children's Social Care immediately. If there is immediate danger, contact the Police via 999. Follow local referral procedures set out in the LLR Procedures Manual. Key Resources LLR Safeguarding Procedures Manual: https://lrsb.trixonline.co.uk/ Policies and Procedures Hub: https://lrsb.org.uk/policiesandprocedures Leicestershire and Rutland Safeguarding Children Partnership: https://lrsb.org.uk/lrsbcp
Lincolnshire	For Lincolnshire, the local safeguarding procedures are provided through the Lincolnshire Safeguarding Children Partnership (LSCP), which is the statutory multi-agency partnership responsible for coordinating safeguarding arrangements across the county. Main Safeguarding Procedures The authoritative source is the Lincolnshire SCP Policy and Procedures Manual, an online manual containing the policies, procedures, and practice guidance used by all safeguarding partners, including schools, children's social care, health services, police, and the voluntary sector. Manual: https://lincolnshirescp.trixonline.co.uk/ Reporting a Concern If there is concern that a child is suffering or is likely to suffer significant harm: Contact Children's Services immediately.

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	Contact the Police via 999 if a child is at immediate risk. Follow the LSCP referral and information-sharing procedures. A public and professional reporting route is available through Lincolnshire County Council's safeguarding pages. Key Links Lincolnshire Safeguarding Children Partnership (LSCP): https://www.lincolnshire.gov.uk/safeguarding/lscp LSCP Training and Resources Hub: https://www.lincolnshirescp.org.uk/ LSCP Policy and Procedures Manual: https://lincolnshirescp.trixonline.co.uk/ As a safeguarding leader in Lincolnshire, the key local documents to reference alongside Keeping Children Safe in Education (KCSIE) and Working Together to Safeguard Children 2026 are the LSCP Policy and Procedures Manual, the local resource library, and the school safeguarding compliance materials.
Nottinghamshire:	The key document is the Nottinghamshire Safeguarding Children Partnership (NSCP) Interagency Safeguarding Children Procedures, which are used jointly across Nottinghamshire and Nottingham City. These procedures provide the framework for all agencies working with children, including education, social care, health, police, and voluntary organisations. Nottinghamshire Thresholds and Referral Process: For practitioners, Nottinghamshire uses the Pathway to Provision and Early Help Assessment Form (EHAF) to determine levels of need and appropriate intervention. Where there are safeguarding concerns: Immediate risk of significant harm → Contact Police (999) and Children's Social Care immediately. Child protection concerns → Referral to the Multi-Agency Safeguarding Hub (MASH). Additional needs but not significant harm → Early Help assessment and coordinated support. Access information and support for Nottinghamshire here: NSCP Interagency Safeguarding Children Procedures - https://nottinghamshirescp.trixonline.co.uk/ For DSLs and safeguarding leaders, the Trix Procedures Manual is typically the key reference source for local safeguarding procedures and guidance.