Bright Futures

EDUCATIONAL TRUST

The best *for* everyone, the best *from* everyone

DRAFT

Child Protection and Safeguarding: Policy, Procedures & Guidance

See something, say something, do something

01 September 2026

This is a Trust-wide policy. All schools are required to have their own, school-specific policy reflecting their local context.

Date of Policy Approval:	October 26
Owner of Policy:	Jayne Carmichael, Trust Safeguarding Lead
Authorised By:	Board of Trustees
Policy Review Date:	Annually
Distribution:	**All staff, workers, governors and trustees** **Website**

CONTENTS

Section 1: Key Contacts	P6
Section 2: Policy and Principles Vision statement Mission Safeguarding statement What are the policy and procedures for? Who is the Policy for? Aims of the policy Terminology in this policy	P9
Section 3: Procedures Concerns about a child's safety or welfare Guidance on dealing with disclosures Family Help	P13
Section 4: Roles and responsibilities Designated Safeguarding Lead (DSL) Deputy Designated Safeguarding Lead (DDSL) Principal Local Governing Body Board of Trustees Staff	P15
Section 5: Specific safeguarding issues in school 'Contextual Safeguarding' and extra-familial harms Children's mental health Domestic violence and abuse Operation Encompass Homelessness Temporary accommodation and housing notifications Cybercrime Child abduction and community safety incidents Preventing Extremism and Radicalisation – The 'Prevent Duty' Child Sexual Exploitation Female Genital Mutilation (FGM) Forced Marriage 'Honour or faith based' abuse and violence Modern Slavery and Human Trafficking Self-Injury/Harming Child on child Abuse: sexual violence and sexual harassment between children Misogyny Harmful sexual behaviour Bullying 'County Lines', serious violent crime and criminal exploitation Safeguarding Students with Special Educational Needs, Disabilities and Medical Needs* Safeguarding children from groups who may experience increased vulnerability	P17

DRAFT

Looked after children, children who need a social worker, those on the edge of care and care leavers Children missing from school Privately fostered children Children who are lesbian, gay, bi or trans (LGBTQ+) Safeguarding children from groups who may experience increased vulnerability Other vulnerable learners Children in the Court System Children with parents/carers in custody Young carers Attendance, Exclusions, Children Absent/Missing from Temporary Separation of Pupils for Safeguarding Purposes Education and Safeguarding Part time/build up timetables Elective home education	
Section 6: Safeguarding in the Curriculum Online Safety and mobile devices/phone use Artificial Intelligence (AI) and emerging technologies Filtering and Monitoring Enhanced filtering and monitoring Photography and Images Educational trips, visits and residential activities Off-site activities Work experience 'Homestay' exchange visits, including visits abroad Residential visits and sleeping arrangements Students placed in alternative provision Visitors To schools Volunteers at schools Contractors and third-party professionals	**P38**
Section 7: Staffing and operational issues Safe and Fair Recruitment Safeguarding allegations against staff and safeguarding concerns including 'low level' concerns Supply teachers/agency workers Lettings of school premises Disqualification by association and childcare disqualification	**P47**
Section 8: Confidentiality and Sharing Information Information sharing and data protection Decisions about sharing or not sharing information	**P49**
Section 9: Training and development Staff, Local Governor and Trustee Training	**P51**
Appendix A: WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD'S WELFARE - TAKING ACTION What to do if you are concerned about a pupil's welfare If a child chooses to disclose abuse to you	**P53**

What happens next? Referral to Children's Social Care Reporting directly to child protection agencies	
Appendix B: RECOGNISING ABUSE AND NEGLECT Abuse Neglect Categories of abuse and neglect Indicators of abuse Impact of abuse	P56
Appendix C: Exemplar report form/log (whether electronic or hardcopy, the same principles apply)	P59
Appendix D: DESIGNATED SAFEGUARDING LEAD Responsibilities of the Designated Safeguarding Lead	P60
Appendix E: THE LOCAL GOVERNING BODY AND THE CHILD PROTECTION & SAFEGUARDING GOVERNOR Responsibilities of the Local Governing Body Responsibilities of the child protection and safeguarding governor	P66
Appendix F: THE BOARD OF TRUSTEES AND THE CHILD PROTECTION & SAFEGUARDING TRUSTEE Responsibilities of the Board of Trustees Responsibilities of the Lead Trustee for Child Protection and Safeguarding	P68
Appendix G: Alternative Provision	P69

CHILD PROTECTION AND SAFEGUARDING: POLICY, PROCEDURES & GUIDANCE (updated to include Sept 2026 statutory guidance)

Section 1: Key contacts

Each school will have its own list of relevant contacts for its local area. Schools will note the safeguarding risks and issues that are pertinent to their local contexts. The following are national or Trust-wide contacts:

Trust Safeguarding Leads:

Making a decision about safeguarding matters can be difficult. It sometimes helps to talk it through with someone else or to seek further advice. Any of the DSL/DDSLs are happy to help. They have a wealth of experience. *Working together to safeguard children* is more than a strapline – it is the most effective approach to keeping people safe.

You can also contact
Trust Safeguarding Lead: Jayne Carmichael (jcarmichael@bright-futures.co.uk)
Trust Deputy Safeguarding Lead:
Amy Footman (AFootman@sgpa.bright-futures.co.uk)

The Trust Safeguarding Lead must be informed without delay whenever a referral is made to the Local Authority Designated Officer (LADO) regarding an allegation, low-level concern or safeguarding matter involving a member of staff, volunteer, contractor, trainee teacher, governor or any other adult working on behalf of the school.

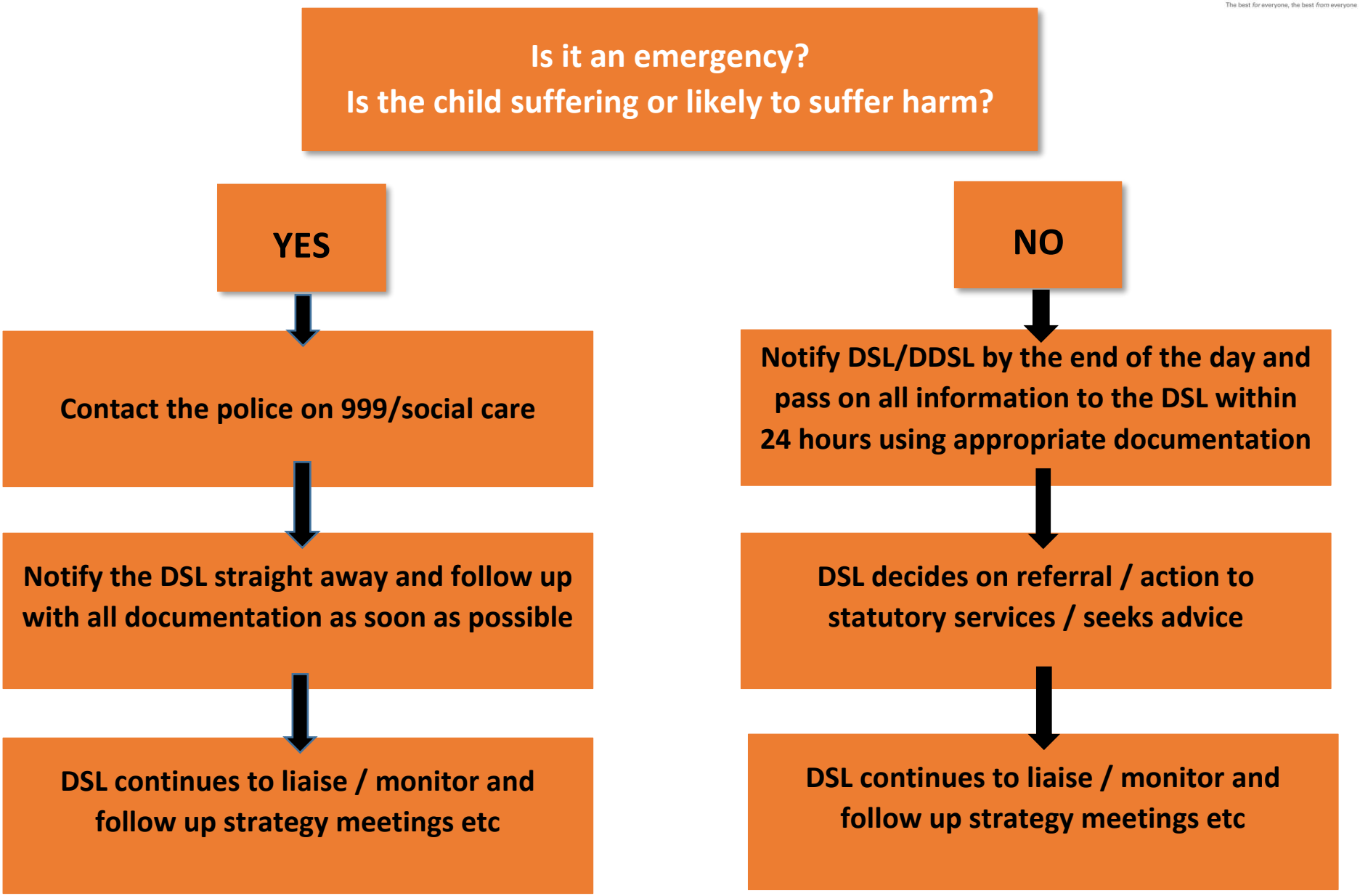
Safeguarding concern / serious incident identified
↓
DSL informed immediately
↓
Principal informed
↓
External agencies contacted if required
(Police / CSC / LADO)
↓
Trust Safeguarding Lead informed
↓
Risk assessment and safeguarding actions

The Trust Safeguarding Lead will provide oversight, advice and support as appropriate, monitor the management of the case, identify any wider organisational risks and ensure that statutory procedures, Trust policies and safeguarding expectations are being followed consistently across the Trust.

Useful organisations and resources (national): a comprehensive list of useful sources and references is included throughout KCSIE (2026) and specifically from p172

- CHILDLINE: 0800 1111 – free confidential helpline for children and young adults
- NSPCC: 0800 800 5000 – free 24-hour national helpline for information and confidential advice about all types of problems
- Barnardo's: 020 8550 8822 – works to transform the lives of vulnerable children and young people
- Kidscape: 020 8830 3300 - produces leaflets and booklets on bullying and runs a helpline
- LGBT Foundation: 0345 330 30 30 – runs a helpline to support people who identify as lesbian, gay, bi-sexual and trans-gender
- National Domestic Violence: 0808 200 0247 – Free 24-hour helpline. Gives information on housing, welfare, health and legal rights, refers women and children to refuges, makes referrals to temporary emergency accommodation and helps to get support from the police
- Stonewall: helpline 0800 050 2020 working for equality for LGBT people
- ThinkuKnow: A CEOP programme that helps with online safety thinkuknow.co.uk
- UK Safer Internet Centre: 0844 381 4772 online safety helpline for professionals working with children
- Young Minds: helpline: 0808 802 5544 support for people with concerns about the mental health of a young person
- KOOTH: online mental health and well-being resources for young people: https://www.kooth.com/
- 'Keeping our children safe: raising awareness in black and minority ethnic communities' NSPCC (2017) Resources and online training to support equality and diversity in safeguarding: https://learning.nspcc.org.uk/research-resources/2017/keeping-our-children-safe

- **FREEDOM TO SPEAK OUT:** The safety of children and young people is paramount. Any staff concerns about the safeguarding actions taken by the DSL or DDSL should be taken, in the first instance, to the Principal/Head of School. Any staff concerns regarding safeguarding actions taken by the Principal should, in the first instance, be taken to the Director of People and Culture of the Trust who will liaise with the CEO. As a last resort staff should call the NSPCC Whistle-blowing Helpline: 0800 028 0285.
- **REPORTING A CONCERN:** Whilst there may be specific referral routes for different forms of abuse (detailed in school policies), the principle in all cases is 'see something, say something, do something'. If a child discloses potential abuse, this MUST be reported to the DSL/DDSL or, in a genuine emergency, to the police. Imminent risk of significant harm means that a child is in danger at that moment and to do nothing would result in actual harm.


Is it an emergency?
Is the child suffering or likely to suffer harm?
YES
Contact the police on 999/social care
Notify the DSL straight away and follow up with all documentation as soon as possible
DSL continues to liaise / monitor and follow up strategy meetings etc
NO
Notify DSL/DDSL by the end of the day and pass on all information to the DSL within 24 hours using appropriate documentation
DSL decides on referral / action to statutory services / seeks advice
DSL continues to liaise / monitor and follow up strategy meetings etc

Section 2: Policy and Principles

Vision statement

'The best *for* everyone, the best *from* everyone'

Mission

To develop great schools and contribute to happier, stronger communities so that our children and people lead better lives. We nurture excellence through high quality educational experiences to ensure a bright future for all.

Safeguarding statement

Bright Futures recognises its moral and statutory responsibilities to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow agreed procedures to ensure that students receive effective support and protection. We recognise that safeguarding is everybody's responsibility. Induction and refresher training for all staff, local governors and trustees is a requirement. All staff working directly or not with children must read and be familiar with 'Keeping Children Safe in Education' (Part 1).

Keeping Children Safe in Education (KCSIE) 2026 is statutory guidance set out in the following order:

- Part One: Safeguarding information for all
- Part Two: The Management of Safeguarding
- Part Three: Safer Recruitment
- Part Four: Safeguarding Concerns or Allegations
- Part Five: Child on Child Sexual Harassment and Sexual Violence
- Annex A: Further Information
- Annex B: Role of The Designated Safeguarding Lead
- Annex C: KCSIE 2026 Summary of Changes

Training for trustees and governors should ensure that they have sufficient knowledge to provide strategic challenge, testing and assuring themselves that school/trust safeguarding policies and procedures are effective and robust. This is not just about receiving data from staff but testing what that data may say about the impact of policy and procedures and whether they need to be strengthened.

Bright Futures is committed to working together well with all relevant agencies in order to promote effective safeguarding arrangements. The Designated Safeguarding Lead (DSL), Principal and local governing bodies should be aware of the arrangements in place for the local authority area in which a particular academy is located. Our statutory partners responsible for leading safeguarding arrangements locally are: the local authority, police and integrated care systems (health). We will, of course, also work with wider agencies in the health and voluntary and community sectors.

What are the policy and procedures for?

All schools within the Trust must comply with the statutory duties and responsibilities to safeguard and promote the welfare of children and young people. Whilst this policy sets out the overarching Trust approach, every school must have its own specific policy and procedures that address the needs of the communities that it serves. This Trust Policy should be a resource to schools within Bright Futures to help them create locally appropriate policies and procedures. It has been developed noting the provisions of the following legislation:

- Children Act 1989;
- Children Act 2004;
- Children and Social Work Act 2017;
- Education Act 2002;
- Education Act 2011;
- Education (Independent School Standards) Regulations 2014;
- Education and Adoption Act 2016;
- Domestic Abuse Act 2021;
- Safeguarding Vulnerable Groups Act 2006, as amended;
- Data Protection Act 2018 and UK General Data Protection Regulation;
- Data (Use and Access) Act 2025;
- Children's Wellbeing and Schools Act 2026;
- Crime and Policing Act 2026;
- Teachers' Standards (2021)

This policy is also informed by, and should be read alongside, the following statutory and non-statutory guidance:

Statutory Safeguarding Guidance

- Keeping Children Safe in Education (DfE, 2026)
- Working Together to Safeguard Children (DfE, 2026)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education Statutory Guidance (DfE, 2026)
- Working Together to Improve School Attendance (DfE, 2024)
- Prevent Duty Guidance: England and Wales (Home Office/DfE, 2024)
- Counter-Terrorism Strategy (CONTEST, 2023)
- Multi-Agency Statutory Guidance for Dealing with Forced Marriage (Home Office, 2023)
- Multi-Agency Statutory Guidance on Female Genital Mutilation (Home Office/DfE, 2020)
- PACE Code C: Requirement for Children to Have an Appropriate Adult (Home Office, 1984)
- Supporting Pupils at School with Medical Conditions and Allergy (DfE, 2026)

Safeguarding Practice and Information Sharing

- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (DfE, 2024)
- Behaviour in Schools (DfE, 2024)
- Preventing and Tackling Bullying (DfE, 2026)

- Mental Health and Behaviour in Schools (DfE) and subsequent Department for Education guidance relating to mental health, wellbeing and safeguarding.

Online Safety, Digital Safeguarding and Technology

- Generative Artificial Intelligence (AI) in Education (DfE, 2025)
- Generative AI Product Safety Expectations (DfE, 2026)
- Filtering and Monitoring Standards for Schools and Colleges (DfE, 2026)
- Mobile Phones in Schools: Guidance for Schools on Prohibiting the Use of Mobile Phones Throughout the School Day (DfE, 2026)
- Online Safety Act 2023 and associated guidance

School-Specific and Local Safeguarding Arrangements

- Local Safeguarding Partnership Procedures
- Local Family Help Arrangements
- Operation Encompass Guidance
- Local Authority Threshold Guidance
- Bright Futures Policies, Procedures and Codes of Conduct

The Trust will also have regard to emerging Department for Education guidance relating to artificial intelligence, cyber security, online safety, filtering and monitoring, Family Help arrangements and other safeguarding matters, as these develop.

Who is the Policy for?

The policy applies to all staff employed by the Bright Futures Educational Trust, all members of local governing bodies and their committees, Members and Trustees plus all consultants or contracted staff undertaking work on behalf of the trust. It is available publicly to give parents/carers and others the necessary assurance that the safety and well-being of children and young people are prioritised and well-managed.

Aims of the policy:

- To ensure that the safety, protection and well-being of all students are paramount and that decisions are taken in the best interests of the child.
- To ensure that all staff and approved volunteers and contractors work safely, understand and act upon their responsibilities to keep children safe.
- To ensure that all students, regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection, recognising the potential for particular vulnerabilities amongst certain groups where stereotyping might prevent the recognition of signs of abuse.
- To ensure that children know that there are trusted adults in school whom they can approach if they have concerns or feel unsafe.
- To ensure students and staff involved in child protection issues will receive prompt and appropriate support.

- To provide all staff with the information and framework necessary to enable them to meet their statutory responsibilities in relation to safeguarding students.
- To ensure consistently good safeguarding practice across all schools in the Trust.
- To demonstrate publicly the Trust's commitment to the safeguarding of children and the promotion of safe working practices.
- To ensure that all staff remain vigilant to the risks of all forms of harm and abuse, including radicalisation, modern slavery, honour or faith based violence and female genital mutilation and that virtual/digital contexts are equal in significance to any other places where abuse could occur.
- To promote good multi-agency working to prevent and respond appropriately to cases of abuse, harm, neglect and exploitation.
- To ensure that all those responsible for governance within the Trust are aware of their duties and responsibilities with regard to safeguarding and discharge them appropriately.

Terminology in this policy

Child Protection as defined as 'Working Together to Safeguard Children' the processes and activity undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm.

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

Staff refers to all those working for or on behalf of the Trust in any schools or settings. This includes part time, full time, temporary, permanent and people working regularly in a voluntary capacity.

Child/children everyone under the age of 18.

Pupils/students refers to those children and young people who receive education in any of the Trust's schools (including those who are 18 or over).

Parents refers to birth parents and all other adults who are in a parenting role or who have rights of parental responsibility, for example, step-parents, foster parents, carers, adoptive parents.

School refers to any establishment within Bright Futures, e.g. nursery, primary, secondary, special or post- 16 and any other setting that may become part of Bright Futures including where Bright Futures is the provider of educational services under contract.

Section 3: Procedures

Concerns about a child's safety or welfare

Each Bright Futures school will have a set of clear procedures to follow if they have concerns about a pupil's welfare and/or safety. Procedures will have some local variation (e.g. contact and referral routes beyond the school) but the following principles must be applied:

1. Any pupil seeking help with a problem must be reassured and their concerns taken seriously. Staff should be aware that children will not always be ready to tell someone that they are being abused and may not even recognise that their experiences are harmful. Embarrassment, threats, language and communication barriers may all inhibit disclosures. Staff should remain professionally curious and report their concerns to the Designated Safeguarding Leave (DSL). By building a relationship of trust, the child may feel ready to disclose.
2. Any member of staff who suspects a pupil may be the victim of abuse must immediately inform the DSL or the Deputy DSL, following this up with a completed 'concern' form (see Appendix C for suggested template) or by recording using the school's electronic system (e.g. CPOMS).
3. When a pupil makes a disclosure of actual or potential abuse to a member of staff, the adult will remain calm and supportive and explain that anything that's said will also have to be shared with the DSL/DDSL.
4. DSL/DDSLs and their support staff will work to ensure there is appropriate support for the pupil, any family members involved.
5. The Principal will be informed when a safeguarding referral has been made but does not need to know the details.
6. Confidentiality must be maintained and the DSL/DDSL will work with all appropriate agencies adhering to the 'Seven Golden Rules of Information Sharing' (2015): necessary, proportionate, relevant, adequate, accurate, timely and secure. The DSL/DDSL should liaise with the three safeguarding partners (local authority, police, integrated care board) and other agencies as appropriate. The National Police Chiefs' Council has issued guidance for schools on when to call the police – if a child is at imminent risk of harm, the police should be called immediately. (NPCC guidance) Advice on the maintenance and sharing of information, including case 'files' is given in Annex B KCSIE (2026).
7. When a child is identified as having suffered harm or abuse or is at risk, a plan of support will be put in place.
8. If children's social care teams are contacted, the DSL/DDSL will inform the family stating that there is a concern and that social care are involved, unless social care advise that this is NOT appropriate.

Guidance on dealing with disclosures

It is important that our schools are places where children, young people, staff, parents/carers and the communities feel able and confident and supported to speak up if they – or someone they know - are suffering or at risk from abuse or if they are aware of inappropriate behaviours. We aim to create and nurture a culture of openness, acceptance and support. We accept with humility

that no matter how good our vigilance, relationships, systems, policies and processes there remains a risk that incidents of abuse may be happening without our knowing.

When dealing with a disclosure, staff should stay calm, be reassuring and not press for information. It's important not to appear shocked or disapproving of what you hear and to listen carefully. Reassure victims that they are being taken seriously and that they will be supported and kept safe. They shouldn't be given the impression they are creating a problem or made to feel ashamed for making a report.

It is important that staff know the indicators of abuse and neglect for specific safeguarding issues such as child criminal exploitation and child sexual exploitation. (see section below).

Staff should be aware that one presenting issue may not be the 'whole story' as safeguarding issues overlap. For example, a child disclosing sexual or physical abuse may be involved in criminal exploitation.

All concerns and details should be reported as soon as possible to the DSL/DDSL.

A written concern form* is required as soon as possible after the conversation. This should be a factual record using the child's own words (as far as possible). The date and time of writing the report should be added. (*This includes electronic reporting such as CPOMS.)

It is the responsibility of the DSL/DDSL to make a decision on what action should be taken in response to a concern.

If a pupil is over 18, has capacity and is not a danger to themselves, permission must be obtained from them to share information they have disclosed with other agencies.

Family Help

Bright Futures recognises safeguarding is not limited to responding to incidents of significant harm. Effective safeguarding also requires the early identification of emerging needs and the provision of timely support to prevent concerns escalating. Schools have an important role in helping children and families access support at the earliest opportunity.

Family Help describes the support provided to children, young people and families when needs are emerging or becoming more complex and where coordinated intervention from one or more agencies can improve outcomes and reduce safeguarding risks. Family Help reflects the principles set out in *Working Together to Safeguard Children* and forms part of the wider safeguarding system.

All staff should be alert to indicators that a child, young person or family may benefit from Family Help and should report concerns promptly through the school's safeguarding procedures. Early identification and intervention can prevent problems from escalating and improve outcomes for children.

Children who may benefit from Family Help include, but are not limited to children:

- Displaying emerging mental health or emotional wellbeing concerns;

- With patterns of poor attendance, persistent absence or repeated lateness;
- Who have experienced multiple suspensions, repeated removals from lessons or are at risk of exclusion;
- With additional needs or disabilities;
- Affected by domestic abuse, parental conflict, parental mental ill-health or substance misuse;
- Acting as young carers and undertaking significant caring responsibilities within the home;
- Living in temporary accommodation or experiencing housing instability;
- With a parent or carer in prison, custody or involved in the criminal justice system;
- Vulnerable to exploitation, serious violence (including weapon carrying and threats involving weapons), radicalisation or other safeguarding concerns;
- Whose circumstances indicate they may require additional support to achieve positive educational and welfare outcomes.

The DSL and safeguarding teams will work with children, families and relevant partner agencies to determine the most appropriate level of support. This may include community-based support, targeted Family Help services, multi-agency planning, or referral to statutory services where thresholds are met.

Schools will actively participate in Family Help assessments, reviews and multi-agency meetings and will share information lawfully, proportionately and in the best interests of the child. The Trust recognises that effective safeguarding relies upon professional curiosity, effective information sharing and collaborative multi-agency working. Schools will participate fully in information sharing arrangements that support assessment, planning, intervention and review processes designed to keep children safe.

The wishes, feelings and lived experiences of children will be central to assessment, planning and decision-making. Bright Futures is committed to working collaboratively with families wherever possible to secure the right help at the right time and to improve children's safety, wellbeing and educational outcomes.

Section 4: Roles and responsibilities

Designated Safeguarding Lead (DSL)

All Bright Futures schools will appoint a member of the Senior Leadership Team as the Designated Safeguarding Lead (DSL) who is responsible for co-ordinating child protection and safeguarding arrangements, including ensuring that appropriately effective filtering and monitoring arrangements are in place. Full details of the DSL role are contained in Appendix D of this Policy.

Deputy Designated Safeguarding Lead (DDSL)

Each school will also appoint a Deputy Designated Safeguarding Lead (DDSL) or, if necessary, more than one. The DDSL must:

- Be trained to the same high level as the DSL;
- Carry out those functions necessary to ensure the on-going safety and protection of pupils if the DSL is unavailable for any reason;
- In any long-term absence of the DSL, the DDSL will assume all the functions of the DSL as outlined in Appendix D. It may be appropriate in these circumstances for the school to appoint an additional DDSL.

Principal

The Principal will:

- Ensure the Child Protection and Safeguarding Policy and Procedures are understood, implemented and adhered to by all staff and that there is a culture of openness and acceptance that helps *everyone* in school to feel confident in reporting concerns as part of a whole school approach to safeguarding;
- Ensure that all teachers meet the expectation set out In the Teachers' Standards that they manage behaviour effectively to create a safe environment;
- Allocate sufficient time, training, support and resources (including cover arrangements when necessary) to enable the DSL and the DDSL to carry out their roles effectively. This should include the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that there is a culture where all staff have the 'freedom to speak out' feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the Trust's Whistle Blowing Policy;
- Ensure that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including online safety and ensure that online safety is explicit in teacher training, all relevant policies and as part of the DSL's role. Teaching and learning about staying safe will need to be accessible for all children, especially those who are vulnerable, victims of abuse and those with special educational needs and/or disabilities;
- Determine the approach to the safe use of mobile technologies, including access to the internet and ensure that appropriate and effective filtering and monitoring systems and procedures are in place;
- Ensure that arrangements are in place to make sure there is a minimum of two contact numbers for every child and that these are updated regularly.
- Liaise with the Local Authority Designated Officer (LADO) where an allegation is made against a member of their staff.
- Ensure anyone who has harmed, or who may pose a risk to a child is referred to the Disclosure and Barring Service after the appropriate procedures have been followed.

Local Governing Body

The Local Governing Body of each school has specific Child Protection and Safeguarding undertakings which help monitor policy and procedure and support the Principal and Senior Leadership Team in keeping safeguarding at the forefront of policy development. The need for governors to be trained in order to provide strategic challenge is a requirement of KCSIE (2026). These are detailed in Appendix E.

Board of Trustees

The Board of Trustees has a specific Child Protection and Safeguarding undertaking which, amongst others, is to oversee that implementation of policy and procedures for the Trust are monitored. The Board will receive a regular update on safeguarding via the regular report of the CEO. This will highlight any strategic safeguarding issues and will inform the Board of any high risk incidents and lessons learned. Training will need to equip trustees with the ability to offer strategic challenge, ensuring that policies and procedures are robust and effective. The Board has a duty to ensure that safeguarding and child protection remain at the forefront, underpinning relevant aspects of policy development. The specific duties are detailed in Appendix F.

Staff

All staff have a responsibility for keeping children safe. They should receive an induction that includes familiarisation with the school's safeguarding procedures. As a minimum, all staff should:

- All staff should know how to contact the DSL and DDSLs and should understand the procedures for reporting concerns when the DSL is absent or unavailable. Staff should never delay sharing a safeguarding concern because their usual safeguarding contact is unavailable;
- Be aware and have an understanding of this Policy and their school's procedures relating to Child Protection and Safeguarding;
- All staff, regardless of role, must read and understand Part One of Keeping Children Safe in Education (KCSIE) 2026. This includes all staff, governors, trustees, volunteers and regular visitors;
- Recognise and understand the indicators of abuse including online (see Appendix B);
- Know what to do if they are concerned about a child's welfare (see Appendix A);
- Undertake the appropriate safeguarding training as highlighted within this Policy;
- Be aware of procedures for promoting good behaviour and managing behaviour;
- Be aware of procedures for children missing and/or absent from education.

Section 5: Specific safeguarding issues in school

'Contextual Safeguarding' and extra-familial harms

This recognises that children, especially as they move into adolescence, are involved in wider social contexts beyond home and school. This can include public places where children and their peers 'hang out', in parks, on public transport etc, but which may present increased risk of child sexual exploitation, peer on peer abuse, teenage relationship abuse, radicalisation, involvement in gangs or other forms of abuse. Contextual safeguarding acknowledges that safeguarding incidents that present in school may well be related to risks outside both the setting and even the home/family environment. We should also be aware of the 'digital context' – children may frequent places and communities online that are as risky as some physical locations. Such risks include (but are not limited to) sexual exploitation, criminal exploitation and serious youth violence, sometimes in combination. It's important that we have an awareness of and assess the risks beyond the home and seek to ensure that interventions help to protect children in whatever

contexts they find themselves. Contextual safeguarding is not simply about the child, however. It is about ensuring the context (the park, the shopping centre, public transport etc) is subject to a child protection assessment and intervention. For more information on this see the NSPCC guidance, CONTEXTUAL SAFEGUARDING. There are specific sections in this policy on child sexual exploitation serious violent crimes (including 'County Lines').

Children's mental health

All staff should be aware that mental health difficulties may, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should avoid, however, making assumptions that presentations of poor mental health are automatically signs of abuse.

Diagnosis of mental health problems should only be made by appropriately trained professionals such as our Educational Psychologists or colleagues in the health sector.

Where children have suffered abuse and neglect or other potentially traumatic experiences in childhood, there can be a longstanding legacy that impacts adversely on their mental health and well-being, their behaviour and their education.

If staff have a mental health concern about a child that is also a safeguarding concern, action should be taken without delay, following the school's referral process and/or consulting with the DSL/DDSL.

Domestic violence and abuse

In recent years there has been a greater recognition of the serious and negative impact of domestic abuse on children and young people, even if they are not the direct victims of violence/other forms of coercive and controlling behaviours. Children witnessing domestic abuse can cause them significant harm in the long term. Children may blame themselves for the domestic abuse or may have had to leave the family because of such abuse. Domestic abuse can happen to anyone. Domestic abuse happens across all socio-economic environments.

It is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality.

If children disclose incidents of domestic violence and abuse it is important that this is treated as a safeguarding issue.

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is

carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected'.

Types of domestic abuse include:

- Intimate partner violence
- Abuse by family members
- Teenage relationship abuse
- Child/adolescent to parent violence and abuse.

Operation Encompass

This statutory operation helps schools and the police to work better together to provide emotional and practical help to children. When the police are called to an incident of domestic abuse where children are connected to the household, regardless of whether they were present at the time of the incident the police are required to inform the main contact (usually the DSL/DDSL) at the children's educational setting before the children arrive at school the following day. In this way, appropriate support can be offered to the child.

Homelessness

Being homeless or at risk of homelessness presents real risks to children's welfare. It's important that the DSL/DDSL knows how to make referrals to the relevant local housing authorities. Referring to the local housing authority does not replace the need for a specific safeguarding referral to children's social care if a child has been harmed or is at risk of harm.

Whilst most instances of homelessness will relate to a child's family it is possible that 16/17 year olds are living independently of their parents/carers. Where there is a risk of homelessness, children's services will be the lead agency. If children below the age of 16 are living independently, this is clearly a safeguarding issue.

Schools should be aware of statutory notifications relating to children placed in temporary accommodation and should use this information to inform safeguarding, attendance and wellbeing support planning.

Temporary accommodation and housing notifications

Children and families who are living in temporary accommodation may experience increased vulnerability and face additional barriers to safety, wellbeing, attendance, health and educational achievement. Frequent moves, disruption to routines, overcrowding, financial pressures and distance from education settings can all increase safeguarding risks. Children living in temporary accommodation should be considered within the school's wider safeguarding and pastoral support arrangements.

In line with statutory arrangements, schools may receive notifications when children are placed in temporary accommodation by a housing authority. The DSL will ensure that such notifications are reviewed promptly and that any safeguarding, welfare, attendance, SEND, health or pastoral needs are assessed and responded to appropriately. The receipt of a notification does not

automatically indicate that a child is at immediate risk of harm; however, it may identify circumstances which require additional support, monitoring or multi-agency working.

Where a child is placed in temporary accommodation, the school will:

- Consider any impact on the child's safety, welfare, attendance, behaviour, wellbeing and educational progress;
- Ensure relevant staff are aware of any additional support needs on a need-to-know basis;
- Work collaboratively with parents, carers, housing providers and partner agencies to reduce barriers to education;
- Consider whether Family Help, targeted support or referral to other services may be appropriate;
- Ensure information is shared lawfully, proportionately and in accordance with safeguarding and data protection requirements;
- Maintain a focus on the child's voice, wishes and lived experience when planning support.

The DSL will ensure children living in temporary accommodation are identified within safeguarding and attendance monitoring systems so emerging concerns can be recognised at the earliest opportunity and support can be provided without delay.

Cybercrime (e.g. 'hacking', spreading of malware)

Cybercrime broadly refers to criminality performed using computer and digital technology. The crime may happen offline but be enabled by the use of technology or may occur online. Where children and young people are involved in this kind of activity there are the same safeguarding concerns that would exist in relation to involvement in any other form of criminality. Annex A of KCSIE (2026) details the typical forms that cybercrime can take and potential signposting that can be made to support children and families.

Children may become caught up in cybercrime inadvertently through, for example, forums that exist around gaming but which use the attraction of a game to lure young people in and groom them. Bright Futures recognises that cyber security and information security form an important part of the Trust's wider safeguarding responsibilities. Effective cyber security arrangements help to protect children, staff and families from harm by reducing the risk of unauthorised access to systems, loss of sensitive information, disruption to learning, cybercrime, online exploitation and other technology-enabled safeguarding risks.

The Trust will adopt a whole-school approach to cyber security, recognising the links between safeguarding, online safety, data protection, information governance and organisational resilience. Appropriate technical and organisational measures will be implemented to protect systems, networks, devices and confidential information.

Staff should remain vigilant to cyber security risks, including phishing emails, malicious links, social engineering, unauthorised access attempts, ransomware, compromised accounts and the inappropriate sharing of personal information. Any cyber security incident that may affect the safety, welfare or privacy of children, staff or families must be reported promptly through the Trust's procedures.

School leaders, the DSL, information governance leads and technical support teams will work collaboratively to ensure that cyber security arrangements support effective safeguarding practice. Cyber security risks and mitigation strategies should be considered as part of safeguarding, online safety, filtering and monitoring reviews.

Pupils will be supported through the curriculum to understand how to protect their personal information, recognise online scams and manipulation, use technology safely and responsibly, and know how to seek help if they have concerns about cyber security or online activity.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. We have experienced cases of child abduction by parents/carers and family members within Bright Futures. Child abduction can be committed by:

- Parents or other family members;
- By people known but not related to the victim (such as neighbours, friends and acquaintances);
- By strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence it is important they are given practical advice on how to keep themselves safe. Lessons should focus on building children's confidence and awareness rather than simply warning them about 'strangers'.

Preventing Extremism and Radicalisation – The 'Prevent Duty'

"The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Our Prevent work also extends to supporting the rehabilitation and disengagement of those already involved in terrorism. The objectives of Prevent are:

- *Tackling the ideological causes of terrorism*
- *Intervening early to support people susceptible to radicalisation*
- *Enabling people who have already engaged in terrorism to disengage and rehabilitate"*

CONTEST: The United Kingdom's Strategy for Countering Terrorism (2023)

The Prevent duty refers to the need to prevent people from becoming terrorists or supporting terrorism. Protecting children from the risk of extremism and radicalisation should be seen as part of all of the Trust's schools' wider safeguarding duties. It is similar in nature to protecting children from other forms of harm, abuse and exploitation. During the process of radicalisation it is possible to intervene to prevent susceptible people from being radicalised. There should be planned opportunities in the curriculum for students to learn about positive social values (referred to in 'Prevent' as 'British values') as defined below (see also Section 6).

Radicalisation refers to the process by which a person comes to support terrorism or other forms of extremism including via online means. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with influences such as family or friends. For some with needs relating to 'belonging' and 'identification', an extremist or terrorist group may appear to provide an answer. The internet and the use of social media, in particular, has become a major factor in the radicalisation of young people.

It is easy to assume that the risk of radicalisation is only associated with certain communities and belief systems. We should avoid those assumptions and remember that extremism happens at both ends of the political spectrum and involvement in activities such as, for example, extreme and violent animal rights campaigns, extreme left/right wing politically activity can equally lead to a child being at risk of radicalisation.

There are a number of behaviours which may indicate a child is at risk of being radicalised or exposed to extreme views. These can include:

- Spending an increasing amount of time in the company of other suspected extremists (online or in person);
- Changing style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming more centred on extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Possession of materials or symbols associated with an extremist cause (including online materials/searches);
- Attempts to recruit others to the group or cause.
- Communications with others which suggests identification with a group, cause or ideology, including the use of 'scripted language';
- Using insulting or derogatory names for another group;
- An increase in prejudice-related incidents committed by that person. These may include:
    - Physical or verbal assault;
    - Provocative behaviour;
    - Damage to property;
    - Derogatory name calling;
    - Possession of prejudice-related materials;
    - Prejudice related ridicule or name calling;
    - Inappropriate forms of address;
    - Refusal to co-operate with reasonable rules of compliance;
    - Attempts to recruit others to prejudice-related organisations;
    - Condoning or supporting violence towards others;

Definitions:

Extremism: Vocal or active opposition to positive social values (referred to as 'British values') as defined below. This also includes calls for the death of members of any of the British armed forces,

whether in this country or overseas. The Crown Prosecution Service defines extremism as "The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts.
- Foster hatred which might lead to inter-community violence in the UK."

Radicalisation: The process by which a person comes to legitimise support for or uses terrorist violence.

'British Values'/positive social values: Democracy, the rule of law, individual liberty and mutual respect and acceptance of those with different faiths and beliefs.

Reporting concerns:

Recording and reporting concerns about a child who may be at risk due to radicalisation are carried out in the same way as other safeguarding concerns. If, however, a referral is made or advice is sought from statutory agencies, the referral may be passed on to a 'Channel' team for specialist assessment and intervention. Individual academies should adhere to local safeguarding partnership arrangements for details of how this works. Channel is a programme to which participants consent.

The DSL should consider if it would be appropriate to share any information with a new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

The government introduced some changes in 2023 and 2024 – for further information refer to: MANAGING RISK OF RADICALISATION IN YOUR EDUCATION SETTING

Child Sexual Exploitation

Child sexual exploitation (CSE) has been prominent in the press in recent years, Cases in Rotherham, Rochdale and Oxford have been widely reported but the prevalence of CSE is not limited to any particular geographical locations nor to specific communities.

CSE is a form of sexual abuse. Children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. There may be links between sexual exploitation and criminal exploitation where an abusive sexual relationship between a child and an adult may be used to coerce and control the child into carrying out criminal activities.

Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and/or education at some point. Some of the following signs may be indicators of sexual exploitation where children:

- Appear with unexplained gifts or new possessions;
- Associate with other young people involved in exploitation;
- Have older boyfriends or girlfriends;
- Suffer from sexually transmitted infections or become pregnant;
- Suffer from changes in emotional well-being or menstrual problems;
- Misuse drugs and alcohol;
- Go missing for periods of time or regularly come home late;
- Regularly miss school or don't take part in education.

Children may not realise they are being exploited and abused; they may be manipulated into believing that they are in a 'romantic relationship'.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and is a form of child abuse with long-lasting, harmful consequences. Professionals in all agencies and individuals and groups in relevant communities need to be alert to the possibility of a girl being at risk of FGM or have already suffered FGM.

Known or suspected cases of FGM should always be reported. Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

FGM is internationally recognised as a violation of the human rights of girls and women. It is illegal in most countries, including the UK. Victims of FGM are likely to come from a community that is known to practice FGM and signs that may indicate a child has undergone FGM include:

- Prolonged absence from school and other activities;
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued;
- Bladder or menstrual problems;
- Finding it difficult to sit still and looking uncomfortable;
- Mentioning something somebody did to them that they are not allowed to talk about;
- Secretive behaviour, including isolating themselves from their group;
- Reluctance to take part in physical activity;
- Repeated urinal tract infection;
- Disclosure.

Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any

other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, and/or emotional and/or psychological. A lack of full and free consent can be where a person does not consent or where they do not have the capacity to give informed consent (e.g. if they have learning disabilities that specifically impact on that capacity).

Some communities use religion and culture as a way to coerce a person into marriage. Schools have a duty to report cases of Forced Marriage to the police (as it is a crime) and to the Forced Marriage Unit in the Foreign and Commonwealth/Home Office. Schools should not attempt to facilitate any kind of 'family counselling' or conferencing in relation to alleged forced marriage issues. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if there is no threat of violence or coercion.

Further information is available at: MULTI-AGENCY GUIDANCE ON FORCED MARRIAGE

'Honour or faith based' abuse and violence

'Honour or faith based' abuse and violence encompasses crimes which have been committed to protect or defend the honour or faith of the family and/or the community. It may include Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of honour or faith based abuse and/or violence are abuse (regardless of motivation) and should be handled and escalated as such. If any member of staff has any concerns at all regarding honour or faith based abuse and/or violence they must speak to the DSL/DDSL. Professionals in all agencies and individuals and groups in communities need to be alert to the possibility of a child being at risk of, or having already suffered honour or faith based abuse. By the time that a disclosure is made it may be necessary to act very quickly to protect a child.

Modern Slavery and Human Trafficking

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.
Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

It is possible to be a victim even if consent has been given to be transported. Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

There are several broad categories of exploitation linked to human trafficking, including:

- Sexual exploitation;
- Forced labour – this is often seen in 'cash only' settings such as car washing, agriculture, mobile catering;
- Domestic servitude;
- Human organ 'harvesting';

- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc;
- Forced marriage and illegal adoption.

In some cases, modern slavery is only discovered by children disclosing their parents' situations at school. Where there is suspected modern slavery, advice should be sought immediately from the police by the DSL/DDSL or via the Modern Slavery Helpline: 08000 121 700.

There is a National Referral Mechanism for victims (or potential victims) of modern slavery and a duty on specified public authorities to notify cases. Only specified organisations such as, for example, the police, NSPCC, local authorities can refer and may, therefore, need information from schools. The guidance is available at MODERN SLAVERY.

Self-Injury/Harming

Self-harm is when somebody hurts themselves on purpose. People usually do it because something else feels wrong. It seems like the only way to let those feelings out. It is a very common behaviour in young people and affects around one in 12 people with 10% of 15-16 year olds self-harming.

If people self-harm it is usually as a result of another problem. It can happen if they are feeling anxious, depressed, stressed or bullied and feel they don't have any other way of dealing with these issues. Often self-harming brings only temporary relief.

Self-injury/harm describes a wide range of things children do to themselves in a deliberate and usually hidden way. In the vast majority of cases self-injury remains a secretive behaviour that can go on for a long time without being discovered. Self-injury/harming can be a coping method for some young people. It can involve:

- Cutting, often to the arms, using razor blades, broken glass, scissors or a pair of compasses (can include scratching, picking, biting or scraping);
- Burning using cigarettes or caustic agents;
- Punching and bruising;
- Inserting or swallowing sharp objects or harmful substances;
- Head banging (hitting themselves against objects);
- Pulling out hair, including eyelashes and/or eye brows;
- Restrictive or binge eating;
- Overdosing;
- Self-neglect;
- Alcohol abuse;
- Taking undue personal risks;
- Sleep deprivation;

Child on child Abuse: sexual violence and sexual harassment between children

Bright Futures recognises that child-on-child abuse is a safeguarding issue that can affect any child and can occur both inside and outside school, including online. Child-on-child abuse is never

acceptable, should never be dismissed as banter, part of growing up, rites of passage or harmless behaviour, and should not be viewed as inevitable. We believe that child-on-child abuse is preventable through a culture of respect, effective safeguarding practice, early identification of concerns, high-quality relationships education and timely, evidence-based intervention**.** Schools will take a preventative, proactive and responsive approach to child-on-child abuse and will provide appropriate support both to children who have experienced abuse and to those whose behaviour may cause harm to others.

Children can abuse other children. We take a collective view that it could happen here, no matter how vigilant we believe we are. There are many different forms peer-on-peer abuse can take. It can happen in school, out of school and in the digital worlds that young people increasingly occupy. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children can be at risk of harm from online abuse as well as face to face.

The Lucy Faithfull Foundation has developed an online resource that aims to prevent harmful sexual behaviour. The link is here: SHORE SPACE

Online abuse may include:

- Abusive, harassing and misogynistic messages: 'physical abuse' includes an online element that facilitates, threatens and/or encourages physical abuse;
- Non-consensual and consensual sharing of indecent nude and semi-nude images and/or videos especially around chat groups (previously referred to as 'sexting');
- Sharing of abusive images and pornography to those who have no wish to receive such content;
- Current data suggests that perpetrators are much more likely to be male and victims female – but we should be vigilant to peer on peer abuse between people identifying as any gender;
- Perpetrators may operate in groups rather than as individuals.

Misogyny

Misogyny and harmful attitudes towards women and girls are safeguarding concerns and will not be tolerated within Bright Futures schools. The Trust recognises that misogynistic language, behaviour, attitudes and beliefs can contribute to a culture in which harmful sexual behaviour, sexual harassment and sexual violence become normalised. These behaviours may occur in person or online and may be influenced by social media, online communities, influencers or other digital content.

Schools will actively challenge misogyny, sexist attitudes, discriminatory language, sexualised bullying and behaviour that undermines the dignity, safety or wellbeing of others. Staff will remain professionally curious about the potential influence of harmful online content and will respond to concerns through education, pastoral support, behaviour processes and safeguarding procedures as appropriate.

Where misogynistic attitudes or behaviours are identified, schools will take a safeguarding-informed approach that seeks both to protect those affected and to address the underlying causes of the behaviour through education, support and, where required, multi-agency intervention.

Harmful Sexual Behaviour (HSB)

Harmful sexual behaviour (HSB) can occur between children of all ages and can take place both online and offline. Harmful sexual behaviour exists on a continuum, ranging from developmentally inappropriate behaviour through to abusive, exploitative or violent behaviour. Such behaviour should always be considered within a safeguarding context and responded to appropriately. Children who display harmful sexual behaviour may themselves have experienced abuse, trauma, neglect, exploitation or other adverse experiences. Whilst this never excuses harmful behaviour, it is important that safeguarding responses consider the needs of all children involved and seek to understand and address underlying causes. Any concerns regarding sexualised behaviour, sexual harassment, sexual violence, coercive behaviour, unwanted sexual comments, online sexual abuse, image-sharing incidents, sexually harmful language or other behaviours that may indicate Harmful Sexual Behaviour will be reported through safeguarding procedures and assessed by the DSL. Responses to Harmful Sexual Behaviour will be proportionate, child-centred and informed by risk assessment. Consideration will be given to the safety and wellbeing of any victim, the risk posed to others, the support needs of the child displaying the behaviour and any wider contextual factors that may be contributing to the behaviour. Where appropriate, schools will work in partnership with parents, carers and external agencies to reduce risk and support positive behavioural change. Bright Futures adopts a preventative approach to Harmful Sexual Behaviour through its curriculum, relationships education, pastoral support systems, behaviour policies and safeguarding culture. Pupils will be supported to understand consent, respectful relationships, personal boundaries, equality, online safety and responsible behaviour. Early intervention will be used wherever possible to prevent behaviours escalating into more serious safeguarding concerns.

Additionally abuse between young people may include, but is not limited to:

- Gender based violence including in the context of intimate personal relationships between peers;
- Sexual assaults; ‘sexual violence’ includes an online element which facilitates, threatens and/or encourages sexual violence;
- Name calling and bullying (including cyber bullying) and prejudice-based and discriminatory bullying;
- Coercing someone to engage in sexual activity without consent (e.g. forcing someone to strip, touch themselves sexually or coercing them into sexual activity with a third party);
- Violent, humiliating, coercive initiation or ‘hazing’ activities – including any online elements;
- Persistent sexualised comments, jokes or language;
- Unwanted sexual attention or sexual intimidation;
- Coercive, controlling or manipulative behaviour within peer relationships;
- Sharing, creating or threatening to share sexual images;
- AI-generated sexual images, deepfake imagery or digitally manipulated intimate images;
- Repeated boundary violations despite correction or intervention;

- Behaviour influenced by exposure to harmful online content, pornography or misogynistic material.

Preventative education is a key safeguarding strategy. Through the curriculum, assemblies, pastoral support and wider school culture, children will be helped to understand healthy relationships, respect, consent, appropriate boundaries, online safety and how to seek help if they are worried about themselves or others. Schools will challenge harmful attitudes, discriminatory language, misogyny, sexualised behaviours and harmful online influences wherever they occur. Early support and intervention will be used wherever possible to prevent behaviours escalating and to promote positive relationships.

It is important that we all recognise the possibility of sexual abuse between children whether or not it is reported. Learning about good, safe relationships and what to do if you feel unsafe should form part of students' learning.

'Upskirting' is a criminal offence under the Voyeurism (Offences) Act 2019 and is defined as: typically when a photograph is taken under a person's clothing without their permission, for sexual gratification or to cause the victim humiliation, distress or alarm.

Any form of child-on-child abuse, like any other abuse, should be treated seriously, challenged and not tolerated. There is a risk that ignoring abusive behaviour or passing it off as 'banter' creates a culture where sexual abuse becomes normalised. Where staff have concerns or receive a disclosure the child should be re-assured and supported and the DSL/DDSL informed as soon as possible so that appropriate action – including referral to other agencies – can be taken. Action may also be taken without the need for a formal disclosure, for example, an adult may overhear a conversation or may learn of abuse by directly questioning a student.

If there is an online element to the alleged abuse, staff may confiscate any mobile devices that may contain evidence and hand these to the police.

Children may be harmed by other children or young people and there will be occasions when a pupil may exhibit sexual violence and/or harassment. Research suggests that up to thirty per cent of child sexual abuse is committed by someone under the age of 18. Evidence suggests that girls, children with SEND and LGBTQ+ children are at greater risk. The management of children with sexually harmful behaviour is complex and all schools within the Trust will work with other relevant agencies to maintain the safety of their whole school community. Children who display such behaviour may be victims of abuse themselves and the child protection procedures should be followed for alleged victims and perpetrators. Staff who become concerned about a pupil's sexual behaviour, including any known online sexual behaviour, should speak to their DSL/DDSL as soon as possible.

Bright Futures recognises that child-on-child abuse is a safeguarding concern for all children involved. Responses will be victim-centred whilst also considering the welfare, safeguarding needs and support requirements of the alleged perpetrator. Wherever appropriate, interventions will seek to reduce future risk, address underlying causes and promote positive behavioural change.

Importantly, all staff need to be clear that:

- Sexual violence/harassment are not acceptable;
- Sexual violence/harassment should never be dismissed as 'banter', 'having a laugh', 'boys will be boys';
- Behaviours such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts must be challenged; dismissing or tolerating such behaviours risks normalising them.

Extensive guidance is provided in Part 5 of Keeping Children Safe in Education (2026). All policies, training, updates and guidance in Bright Futures' Academies must include this as a specific topic, describing the school's approach to dealing with these issues.

Each academy policy should additionally include:

- The whole school approach to child-on-child abuse;
- Reporting systems and how everyone will know and understand them;
- How child-on-child abuse can happen digitally and measures to manage and mitigate this;
- How children with particular vulnerabilities can be supported in overcoming barriers to 'speaking up' about abuse.

Managing situations where an alleged perpetrator and victim are in the same school is often difficult, as is the balance of risk. The wishes of the victim and the need to safeguard all children and young people need to be considered and arrangements formally recorded. The DSL will need to work in partnership with other agencies to manage allegations, investigations, the safety and well-being of all concerned and any outcomes, including a risk assessment being caried out

Where an allegation of sexual violence/harassment is progressing through the criminal justice system it is important that schools do everything they can to maintain the anonymity of everyone involved, including having an awareness of the potential for social media to be used to spread rumours. The DSL will usually lead any risk assessments where there has been an allegation of sexual harassment/abuse and will consider: the victim, the potential for other victims, alleged perpetrators, all who may need protection (adults and children), the physical context of any incident and whether any actions are needed to make the location safe.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level bullying can have a disastrous effect on a child's wellbeing and, in very rare cases, has been a feature in suicide. The school's Anti-Bullying Policy should be referred to in all instances where bullying is suspected and action taken to ensure that bullying is prevented and responded to effectively. (BEHAVIOUR IN SCHOOLS GUIDANCE). Cyber-bullying can be particularly harmful to victims as there is often no refuge from the platforms that enable this to be perpetrated. It is important that children and young people learn about the need to use technology responsibly and understand the seriousness of online abuse. Prejudiced-based and discriminatory bullying need to be specifically referenced and with a description of both preventative measures and reactive procedures.

'County Lines', serious violent crime and criminal exploitation

Criminal exploitation is sometimes referred to as 'county lines' and is when gangs and organised crime networks exploit children to sell drugs or engage in other forms of criminal activity. Often these children are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs. No one really knows how many young people across the country are being forced to take part, but The Children's Commissioner estimates there are at least 46,000 children in England who are involved in gang activity. Gang activity may involve children of different genders although their activities may be different.

Often, these children are seen as criminals. Criminal gangs deliberately target vulnerable children – those who are homeless, living in care homes or trapped in poverty. These children are unsafe, unloved, or unable to cope, and the gangs take advantage of this.

The gangs groom, threaten or trick children into trafficking their drugs for them or carrying out other crimes. They might threaten a young person physically, or they might threaten the young person's family members. The gangs might also offer something in return for the young person's cooperation – it could be money, food, alcohol, clothes and jewellery, or improved status – but the giving of these gifts will usually be manipulated so that the child feels they are in debt to their exploiter.

Any suspicion that children are involved in these activities must be reported via the normal safeguarding routes. Even though children may have committed criminal acts themselves they need to be treated as victims of abuse.

Typical signs of potential involvement in criminal exploitation are:

- Returning home late, staying out all night or going missing;
- Going missing from school or home and being found in areas away from home;
- Increasing drug use, or being found to have large amounts of drugs on them;
- Being secretive about who they are talking to and where they are going;
- Unexplained absences from school, college, training or work and decline in performance;
- Unexplained money, phone(s), clothes or jewellery;
- Increasingly disruptive or aggressive behaviour;
- Using sexual, drug-related or violent language you wouldn't expect them to know;
- Coming home with injuries or looking particularly dishevelled;
- Having hotel cards or keys to unknown places or unknown people appearing to 'take over' the child's home ('cuckooing') especially if the child is living independently;
- Vehicle crime and threatening/committing serious violence – have been the perpetrator (or alleged perpetrator) of serious violence as well as being the victim;
- Children carrying weapons for protection.

Safeguarding Students with Special Educational Needs, Disabilities and Medical Needs

KCSIE (2026) makes further specific reference to the safeguarding of particular groups of children and young people. There's a concern that for children with SEN and disabilities, their SEN or disability needs are seen first, and the potential for abuse second. If children are behaving in particular ways or they're looking distressed or their behaviour or demeanour is different from in

the past, staff should consider whether that is a sign of potential abuse, and not simply see it as part of their disability or their special educational needs. (see NSPCC Guidance)

Children with SEND have a higher risk of being left out, of being isolated from their peers, and they are disproportionately affected by bullying. Schools should make sure that children with SEN and disabilities have got a greater availability of appropriate mentoring and support.

Each school should provide clear procedures for managing prescription medicines which need to be taken during the school day. All staff are given clear guidance on the administration of medicines All staff are issued with information at the start of each academic year which outlines the students with the asthma, diabetes, anaphylaxis and epilepsy. Staff have responsibility to check the medical information for all the classes they teach. All staff will be notified of any changes throughout the academic year.

Safeguarding children from groups who may experience increased vulnerability

Looked after children, children who need a social worker, those on the edge of care and care leavers

The most common reason for children to become 'looked after' is as a result of abuse or neglect. Each school will ensure all staff have the necessary skills and understanding to keep Looked After children safe. Appropriate staff will have access to information about a child's Looked After status and care arrangements, including the level of authority delegated to the carer by the local authority caring for the child. The DSL/DDSL will have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Once children come into the care system, they are afforded special status and protection. This is not the case for children on the edge of care. Schools need to be aware of those children and young people who are known to social care but who are not formally in the care system. The safeguarding of this group of people also needs careful planning.

Those who leave care, perhaps by being adopted, have the advantage of achieving a long term family context. Even so, their safeguarding needs and issues will need to be considered and planned for.

When children have an allocated social worker it is usually because of safeguarding or welfare needs. The child may have complex family circumstances or have suffered abuse and neglect. Experiencing adversity and trauma can leave children vulnerable to further harm. They may be educationally disadvantaged through barriers to attendance, difficulties with learning, presentations of poor behaviour and poor mental health.

DSLs should be made aware when a child has a social worker. This enables the DSL to ensure that decisions are made in the best interests of the child's safety, welfare and educational outcomes. Moreover, knowing the vulnerabilities associated with a child who has an allocated social worker should inform decisions about safeguarding (e.g. responding to absence where there might be an increased safeguarding risk) as well as considering ways in which they might access additional support to improve their engagement and educational outcomes. Helpful advice on this is

available from the interim review: 'Improving the educational outcomes of Children in Need of help and protection' and final review 'Help, protection, education' (2019) both available HERE.

Children missing from school

As highlighted in the 'Attendance' section (below) each school will closely monitor attendance, absence and exclusions. A child regularly missing school is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL/DDSL will work with the school's attendance officers to monitor any unauthorised absence and take appropriate action, including notifying the local authority if appropriate, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. The school will ensure all staff are aware of the importance of, and be alert to, signs of children being at risk of female genital mutilation, forced marriage, forced labour and/or travelling to conflict zones or involvement in criminal exploitation (online or in person).

Privately fostered children

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or under the age of 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture, and children may be privately fostered at any age under the limit. Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important the schools are alert to possible safeguarding issues, including the possibility a child has been trafficked into the country. If a member of staff becomes aware a pupil may be in a private fostering arrangement, they should raise this with the DSL/DDSL who should notify the appropriate local authority of any concerns that may be linked to the placement. Any safeguarding concerns about the child or placement which arise following the placement should be reported to Children's Social Care. (see DfE statutory guidance: HERE)

Children who are lesbian, gay, bi or trans (LGBTQ+)

There is no reason why children who are LGBTQ+ should be seen as inherently at greater risk of harm and abuse. However, they may be targeted for bullying or suffer exclusionary pressures. It is important LGBTQ+ children have a trusted adult and a 'safe space' where they can express any concerns. It is equally important that all Bright Futures schools work to become more inclusive thereby reducing incidents of intolerance and bullying.

Safeguarding children from groups who may experience increased vulnerability

Bright Futures recognises that some children and young people may experience uncertainty, distress or questioning in relation to their gender. In supporting children who are questioning their gender, the Trust will adopt a child-centred, safeguarding-focused approach which places the safety, welfare and best interests of the child at the centre of decision-making.

Where a child is understood to be "living in stealth" (where aspects of the child's gender identity are not known to some or all members of the school community), the school will carefully consider

any safeguarding, welfare, confidentiality and information-sharing implications, ensuring that decisions are made on a case-by-case basis, are regularly reviewed, and remain focused on the best interests, safety and wellbeing of the child and others.

Children who are questioning their gender may experience a range of social, emotional, mental health or wellbeing challenges. Some may also be vulnerable to bullying, harassment, social isolation, exploitation or online harms. Schools will consider each child's individual circumstances and will avoid making assumptions about a child's experiences, needs or identity.

The DSL should be informed of significant safeguarding, welfare or wellbeing concerns relating to a child who is questioning their gender. Decisions regarding support should be considered on a case-by-case basis, taking account of safeguarding risks, the child's wishes and feelings, parental involvement, legal duties and the child's overall wellbeing.

Bright Futures recognises the important role of parents and carers in supporting children. In the vast majority of circumstances, schools will work openly and collaboratively with parents and carers when supporting a child who is questioning their gender. Where there are concerns that involving a parent or carer may place a child at risk of harm, advice will be sought from the DSL and, where appropriate, children's social care or other relevant agencies.

Support plans should be reviewed regularly and remain responsive to the child's evolving needs and circumstances. Schools will recognise that a child's views, feelings and understanding may change over time and that decisions should remain flexible and subject to ongoing review. Schools should exercise particular care where requests involve significant changes to how a child is supported within school and should ensure that any decisions are informed by safeguarding considerations, educational needs, equality duties and the rights and wellbeing of all pupils.

Children who may be living in secrecy regarding aspects of their identity, children who later choose a different pathway, and children who may experience distress associated with previous decisions should receive appropriate pastoral support and safeguarding consideration. Schools will avoid reinforcing harmful stereotypes and will ensure that support remains individualised, respectful and focused on the child's welfare.

Other vulnerable learners

Other children may have an increased risk of abuse. Many factors can contribute including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur. To ensure all pupils receive equal protection, all staff should give special consideration to those who are:

- Disabled;
- Affected by parental substance misuse, domestic violence or parental mental health needs;
- Asylum seekers;
- Living away from home;
- Vulnerable to being bullied or engaging in bullying;
- Living in temporary accommodation or experiencing housing instability, homelessness or frequent housing moves;
- Live transient lifestyles;

- Live in frequently disrupted and unsupportive home situations;
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- At risk of sexual exploitation;
- Do not have English as a first language;
- At risk of female genital mutilation (FGM);
- At risk of forced marriage;
- At risk of being drawn into extremism;
- Attending 'alternative provision' (see Appendix G for detailed guidance);

The above list provides examples of additional vulnerable groups and is not exhaustive.

Children in the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds.

Making arrangements for the custody of children via the family courts following separation can be stressful and entrench conflict in families. This can be particularly stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service.

Children with parents/carers in custody

Approximately 200,000 children have a parent sent to prison each year with many more in custody for various periods. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre for Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. https://www.nicco.org.uk/

Children who have a parent, carer or close family member in prison or other forms of custody may experience a range of safeguarding, welfare and educational challenges. These children can be more vulnerable to poor emotional wellbeing, anxiety, stigma, social isolation, disrupted family relationships, poverty, unstable living arrangements, poor attendance and adverse educational outcomes.

Bright Futures recognises that the imprisonment of a parent or carer can be a significant adverse childhood experience and may affect a child's behaviour, relationships, mental health and sense of security. Whilst many children demonstrate resilience, schools should remain alert to the potential impact of parental imprisonment and consider whether additional support may be required.

Schools will seek to identify and support children affected by parental imprisonment at the earliest opportunity and will work sensitively with families, recognising that some children may not wish others to know about their circumstances. Information will be shared on a need-to-know basis and in accordance with safeguarding and data protection requirements.

The DSL should consider whether children affected by parental imprisonment may benefit from additional pastoral support, Family Help, mental health support, attendance interventions or

signposting to specialist services. Consideration should also be given to the child's educational outcomes, emotional wellbeing and broader safeguarding needs.

Young Carers

A young carer is a child or young person who provides, or helps to provide, care for a family member who may have a disability, long-term illness, mental health difficulty, substance misuse issue or other additional need. Caring responsibilities may have a significant impact on a child's wellbeing, attendance, readiness to learn, social relationships, emotional health and educational achievement. Bright Futures recognises that young carers may be a vulnerable group and that caring responsibilities can sometimes affect a child's ability to participate fully in school life. Whilst many young carers demonstrate resilience and develop valuable skills, schools should remain alert to the potential impact of caring responsibilities and consider whether additional support may be required.

Staff should be aware that some children may not recognise themselves as young carers or may be reluctant to discuss their caring responsibilities due to concerns about stigma, family privacy or fear of intervention. Schools will seek to identify young carers sensitively and at the earliest opportunity. Where a child is identified as a young carer, consideration will be given to any impact on attendance, punctuality, educational progress, mental health, wellbeing and safeguarding. The DSL may consider whether Family Help, pastoral support, attendance support, mental health support or referral to specialist young carer services would be beneficial.

Bright Futures will work collaboratively with families, young carer services and partner agencies to ensure that children with caring responsibilities receive appropriate support and that barriers to participation, learning and achievement are identified and addressed.

Attendance, exclusions, children absent/missing from education and safeguarding

Good attendance at school is a protective factor for children. Parents also have a legal obligation to ensure that their children attend school every day unless there is a good reason for absence. Full guidance is included in the statutory guidance 'Working Together to Improve School Attendance' (2024). Unexplained absences from school can indicate an increased risk of child sexual exploitation, radicalisation, neglect, 'county lines' or other forms of harm and abuse.

In accordance with schools' Attendance Policies, absences must be rigorously pursued and recorded. Each academy, in partnership with the appropriate agencies, must take timely action to encourage good, regular attendance and to prevent, pursue and address all absences in order to safeguard the welfare of students in its care. The Attendance Policy identifies how individual cases are managed and how we work proactively with parents/carers to ensure that they understand why attendance is important. In certain cases this may form part of a Family Help Assessment (EHA) or Common Assessment Framework (CAF), and form part of the evidence relating to child protection procedures.

We implement the statutory requirements in terms of monitoring and reporting children missing education (CME). A student should not be taken off roll until we are sure of the pupil destination or instructed to do so by the Local Authority. We understand how important this practice is in

safeguarding students. Should a student leave the building without permission a call is made to a member of SLT who will contact the police and ensure the parent/carer is notified. The incident, police reference number and any relevant outcomes are logged. All parents/carers who are collecting a student from the academy during the school day will be asked to sign the student out in the signing out book. The DSL will be informed when a fixed term or permanent exclusion is being discussed and any safeguarding issues will be considered. Local governors on exclusion panels need to be satisfied that any safeguarding issues that may arise from an exclusion are properly managed. Where it is felt that a student is likely to be permanently excluded a full assessment will be instigated to ensure that there is improved understanding of the needs of the student and their family and that the key agencies are involved.

Here's a shorter policy version that retains the key safeguarding and legal principles:

Temporary Separation of Pupils for Safeguarding Purposes

In exceptional circumstances, it may be necessary to temporarily prevent a pupil from attending the school premises in order to separate them from another pupil for safeguarding reasons. This may occur where there is an identified safeguarding risk, including allegations of serious harm, and separation is necessary to protect one or more children.

This is not a suspension or permanent exclusion and will not be used as an informal or precautionary exclusion. Any decision will be made on a case-by-case basis, led by the DSL or DDSL and informed by an appropriate risk assessment. Advice will be sought from children's social care, the police, the Local Authority, the Trust or other relevant agencies where appropriate.

The school will consider the safety, welfare and best interests of all children involved, the views of the child where appropriate, any relevant legal duties, alternative arrangements that may safely manage the risk, and the educational and support needs of the pupil concerned.

Parents/carers will be informed of the reasons for the arrangement and the Trust will be notified. The arrangement will be reviewed regularly, remain in place only for as long as necessary and proportionate, and be supported by appropriate education, pastoral support and reintegration planning.

Part time/build up timetables

Occasionally schools may make a time-limited use of part time timetables for specific students. These should only be used to support the learning and/or medical needs of a student and to promote the re-integration and inclusion of students with particular needs.

Before a part time timetable is considered, a full risk assessment should be carried out with the help of the DSL to ensure that any potential or actual safeguarding issues are identified and properly managed. Regular and frequent reviews of the arrangements should be conducted to evaluate the success of a part time timetable arrangement and to ensure that no safeguarding risks have materialised or increased. The rationale for a part time timetable arrangement, the risk assessments and regular impact reviews and subsequent decisions all need to be formally documented.

Elective home education

Parents have a right to elect to home educate. During the period of the Covid 19 pandemic there was a significant increase nationally in the numbers of children being electively home educated. Where schools come across such requests and arrangements it is important that any on-going safeguarding concerns are properly communicated by the DSL to the relevant partner agencies. Where there are serious safeguarding concerns or the child is subject to a child protection plan/enquiries, an urgent referral should be made to children's social care.

Section 6: Safeguarding in the Curriculum

One of the most effective ways to safeguard children, within and beyond the school is for them to learn about how to keep themselves safe in a range of different situations. Confident children who have learned how to deal with difficult and unfamiliar situations and who know how to speak out if things are wrong will also know how to stay safe.

From Early Years right through to Post-16, schools should be active in preparing pupils for life in modern Britain and show vigilance in identifying any signs that fundamental positive social values (referred to sometimes as 'British Values') are being undermined. Having explicit and planned opportunities in the curriculum for students to learn about positive social value is an important way for us to discharge our 'Prevent' duties. Pupils with low aspirations may be more vulnerable to radicalisation and all schools will work to equip their pupils with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

The curriculum in all schools will promote respect, tolerance and diversity and help pupils to understand and manage risks and keep themselves safe. Schools can play an important role in preventative education, helping students to learn that sexism, misogyny, misandry, homophobia, biphobia, transphobia and sexual harassment/violence are unacceptable. Subject to students' age and developmental stages they can be taught boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem. They may also learn how to recognise and deal with abusive relationships and the laws to prevent abuse, including FGM. This may be done through a variety of ways, including (but not exclusive to):

- Different strands of the curriculum;
- Specific online safety, PSHE, Rights Respecting School Standards;
- Themed assemblies;
- Staff working with pupils to help them think about risks they may encounter and work out how these risks might be overcome;
- Discussions about risk are empowering and enabling for all pupils and promote sensible behaviour rather than fear or anxiety.

Relationships, health and sex education provides opportunities for learning about safeguarding. Teaching and learning within this area can provide a good opportunity for students to learn about safe and healthy relationships as well as the risks of exploitation. Please note, current guidance

was issued in 2021 revised guidance came into force in September 2026 (REVISED GUIDANCE FOR 2026).

Through Relationships, Sex and Health Education (RSHE), Personal Development and wider pastoral provision, pupils will be supported to understand healthy relationships, respect, equality, consent, appropriate boundaries and the impact of sexism, misogyny and harmful stereotypes:

- Preventative education will promote a culture in which all members of the school community feel safe, respected and valued.
- Pupils learning through experience how to conduct themselves in a range of different situations, including preparation for the workplace.
- Encouraging pupils to share their views and recognise they are entitled to have different beliefs.
- Pupils being taught about how to deal with bullying, including cyber bullying, and how to stay safe when using the internet.
- Pupils being encouraged to speak to a member of staff about any worries they may have.
- The Trust and all schools continually promoting and demonstrating an ethos of respect for all through the Vision, Mission, Values and Commitments.

Online Safety and mobile device/phone use

Bright Futures recognises that unrestricted access to mobile phones and personal communication devices during the school day can present safeguarding, wellbeing, behaviour and educational risks. In accordance with the Department for Education's guidance Mobile phones in schools: guidance for schools on prohibiting the use of mobile phones throughout the school day and the expectations set out within KCSIE 2026, schools will operate a mobile phone-free environment throughout the school day unless specific exceptions have been approved by the Headteacher or Principal.

Pupils will not have access to mobile phones or other personal communication devices during lessons, movement between lessons, breaktimes, lunchtimes or other periods of the school day unless there is an identified educational, medical, safeguarding or accessibility need. Any agreed exception will be considered on an individual basis, supported where appropriate by a risk assessment, and communicated to relevant staff to ensure appropriate safeguarding and supervision arrangements are in place.

Schools will ensure that expectations relating to mobile phones and personal communication devices are clearly reflected within behaviour, safeguarding and online safety policies and are communicated effectively to pupils, parents, carers, staff and visitors. The Trust will keep its mobile phone arrangements under review, taking account of statutory guidance, safeguarding risks, emerging technologies and the wellbeing needs of pupils.

The DfE has published guidance (2023) on teaching online safety available via this link. KCSIE (2026) contains additional guidance re: online safety in Part Two. Specifically, governors and trustees need to be assured that the filtering systems in place are sufficiently effective and robust to prevent students accessing harmful material. The list of potential harms has been extended to include the safeguarding risks associated with misinformation, disinformation (including fake

news) and conspiracy theories. Further guidance is provided in KCSIE (2026) relating to filtering and monitoring in school with specific duties placed on the DSL to understand how filtering and monitoring works in schools and its effectiveness. The Trust will have regard to the Department for Education's guidance:

- DfE: Generative Artificial Intelligence (AI) in Education https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education
- DfE: Using AI in Education Settings – Support Materials https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education
- DfE: Generative AI Product Safety Expectations https://www.gov.uk/government/publications/generative-ai-product-safety-expectations

All staff need to be aware of their role in checking and identifying where filtering and monitoring systems are not having the necessary impact. Schools will ensure staff are aware of:

- AI-generated imagery, audio and video content (including deepfakes);
- AI-generated intimate or sexualised images;
- Impersonation, manipulation and online fraud using AI technologies;
- Misinformation, disinformation and conspiracy content generated or amplified by AI systems;
- The use of AI tools in online grooming, coercion, exploitation and harassment;
- Risks associated with unsupervised use of AI chatbots and generative AI platforms.

It is important that parents/carers are engaged in helping to children to navigate digital worlds safely, including awareness about risks such as online gambling. It is important that online is regularly reviewed because it is a rapidly changing context in which new and changing risks emerge.

As schools embraced digital platforms to support learning off site during the 2020/21 lockdowns, there has been far more scope for online abuse to occur. It is important that all online activities are properly assessed in terms of safeguarding, especially where there are live lessons. Students and staff need to be clear on the expectations associated with online learning and need to be aware of indicators of possible harm that can be seen through online learning. Appropriate filtering and controls need to be in place and only approved online meeting platforms used. DSLs should be involved in advising and assessing approaches to online learning from a safeguarding point of view.

Any teaching conducted virtually should adhere to the same high professional standards expected in all other contexts. We will need to ensure that any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. Andrew Hall, safeguarding consultant, has offered the advice (below) for online lessons, especially if live webcams are used. Safe ways to work with students remotely include provision for students to access approved online resources or to have links to resources that the school has pre-recorded. Specific considerations if online (live):

- No 1:1s, groups only;
- Staff and children must wear suitable clothing, as should anyone else in the household;

- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred;
- Access to any live session must be by password/controlled admittance;
- The live class should be recorded so that if any issues were to arise, the video can be reviewed;
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day;
- Language must be professional and appropriate, including any family members in the background;
- Staff must only use approved platforms to communicate with pupils, noting that Teams and Zoom in particular have improved their security and password access arrangements;
- Staff should record, the length, time, date and attendance of any sessions held. Any safeguarding concerns observed or highlighted during any communication with students must be recorded and reported following the usual systems.

Artificial Intelligence (AI) and Emerging Technologies

Bright Futures recognises that developments in artificial intelligence (AI) and emerging digital technologies present both opportunities and safeguarding risks for children and young people. AI technologies are increasingly accessible and may be used positively to support learning, creativity and communication. However, they may also be used to facilitate abuse, exploitation, harassment, misinformation and other forms of harm.

Staff should be aware that AI-generated content can be highly realistic and may be difficult to distinguish from genuine images, audio recordings, videos or written communications. This includes the creation of manipulated or synthetic content, sometimes referred to as "deepfakes", which may be used to ridicule, intimidate, exploit, blackmail, sexually harass or otherwise harm children and young people.

Safeguarding concerns involving AI-generated content will be treated in the same way as any other safeguarding concern. Reports involving AI-generated imagery, digitally manipulated intimate images, online sexual abuse, bullying, harassment, exploitation, coercion or other harmful activity will be responded to promptly through established safeguarding procedures.

The Trust recognises that AI technologies may increase risks associated with misinformation, disinformation, online grooming, harmful influence, fraud, impersonation and the sharing of inappropriate content. Staff will remain professionally curious about the role technology may play when safeguarding concerns arise and will consider whether AI-generated content may have contributed to, facilitated or formed part of a safeguarding incident.

Through the curriculum and wider safeguarding arrangements, pupils will be supported to develop the knowledge and skills needed to critically evaluate online information, understand the risks associated with AI technologies and use digital tools safely, responsibly and ethically.

Filtering and Monitoring

The Trust will ensure that appropriate filtering and monitoring systems are in place to prevent children accessing potentially harmful content and being aware when this may have happened so that a safeguarding check can be made. Filtering and monitoring systems need to be reviewed at least annually with a balance being struck between blocking harmful content without unreasonably impacting teaching and learning. The updated filtering and monitoring standards (updated in 2026) are set out here: FILTERING AND MONITORING

Filtering, monitoring, cyber security and information security arrangements should be considered together as part of the school's safeguarding framework. Annual reviews should assess the effectiveness of technical controls, user behaviours, emerging technology risks and any safeguarding concerns linked to digital systems.

Enhanced Filtering and Monitoring (KCSIE 2026)

Bright Futures recognises that effective filtering and monitoring systems are an important part of the Trust's whole-school safeguarding approach. Filtering and monitoring arrangements are designed to protect children from accessing harmful, inappropriate or illegal content and to identify indicators that children may be at risk of harm, exploitation, abuse, radicalisation or other safeguarding concerns.

The Trust will ensure that filtering and monitoring systems are proportionate, effective, age-appropriate and capable of responding to emerging safeguarding risks. This includes risks associated with social media, online exploitation, misinformation, disinformation, cybercrime, artificial intelligence, deepfake content and other evolving technologies. Filtering and monitoring systems will be reviewed at least annually (KCSIE 2026 Part Two) and whenever significant changes are made to digital systems, safeguarding arrangements or identified risks. Reviews should consider the effectiveness of current controls, emerging online risks, safeguarding incidents, staff and pupil feedback and relevant national guidance.

The DSL, school leaders, governors/trustees responsible for safeguarding and appropriate technical specialists will work collaboratively to ensure filtering and monitoring arrangements remain effective and support the safeguarding needs of pupils.

Staff have an important role in recognising when filtering and monitoring systems may not be operating effectively or when online activity gives rise to safeguarding concerns. Any concerns should be reported without delay through safeguarding processes and addressed promptly.

The Trust will maintain appropriate records of filtering and monitoring reviews and any actions arising from those reviews. These records may be used to provide assurance to governors, trustees, inspectors and external safeguarding agencies regarding the effectiveness of online safeguarding arrangements.

Photography and Images

We recognise that photographic images are now easier than ever to produce. We also know that parents/carers often like to see photo and video images of their children who may, for example,

be away from home on a residential trip. Any person taking photographs, video or any other images of the school and/or the pupils must comply with the regulations as set out in the Trust's Online and ESafety Policy and General Data Protection Regulation Policies.

Educational trips, visits and residential activities

Approvals for educational trips and visits, advance and dynamic risk assessments should always take account of any safeguarding issues.

In cases where activities take place beyond the normal school day, and are provided by a Trust school, the Child Protection and Safeguarding Policy will apply. If other organisations provide services or activities on a school site, the individual school will be responsible for checking these organisations have appropriate safeguarding procedures in place.

Off-site Activities

When pupils attend off-site activities, including day and/or residential visits and work related activities, the individual school will check effective child protection arrangements are in place as part of the risk assessment undertaken before any and each such activity.

Work Experience

Where children or young people undertake placements, work experience, volunteering or similar activities within a Bright Futures school, an assessment will be undertaken to determine whether regulated activity provisions apply and whether additional safeguarding arrangements, supervision or checks are required. Each school will have procedures in place to safeguard pupils undertaking work experience which are in accordance with the guidance in KCSIE 2026 (Part Three). This will include arrangements for checking people who provide placements and supervise pupils to ensure that providers have robust policies and procedures in place to protect children from harm. When students under the age of 18 are placed in Bright Futures schools on work/college experience a proper risk assessment should be undertaken. Where people undertaking work experience in Bright Futures schools are 16 and 17 year olds, there should be a formal assessment to determine if they are engaged in 'regulated activity' and need to be subject to a DBS check and/or appropriately supervised.

'Homestay' exchange visits, including visits abroad

Part Three of KCSIE (2026) provides specific advice and guidance on the management of 'homestay' visits where children and young people's care and accommodation are organised through staying with a 'host' family. All arrangements of this kind in Bright Futures schools should follow the KCSIE (2026) guidance. The regulations governing UK-based 'homestay' arrangements are different from those abroad.

Specifically, where a school/college arranges a UK 'homestay', they should use all available information to assess the suitability of the accommodation, including (from September 2018) the requirement for adults in the host have an enhanced DBS check.

Where schools arrange 'homestay' accommodation abroad, it will not be possible to carry out a DBS check. Schools and colleges should liaise with partner schools abroad, to establish a shared

understanding of, and agreement to the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents/carers should be aware of agreed arrangement. Schools and colleges are also free to decide whether they consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK. In such circumstances, the school will follow the guidance in KCSIE 2026 Part Three, to ensure the hosting arrangements are as safe as possible.

Residential visits and sleeping arrangements

All residential visits, exchanges, sports tours, camps and other overnight activities will be subject to a documented safeguarding and educational-visits risk assessment. Children will not share overnight accommodation with children of the opposite biological sex. This applies to shared bedrooms, dormitories, tents and other communal sleeping arrangements.

Where a child does not wish to share accommodation with children of the same biological sex, the academy will consider whether suitable separate accommodation can reasonably be provided. Any alternative arrangement must preserve the safety, privacy, comfort and dignity of the child and all other children.

Sleeping arrangements will be agreed and documented before departure and will not be changed informally by individual staff during the visit. Any safeguarding concern arising during a residential activity will be reported to the visit leader and DSL without delay.

Students placed in alternative provision

When a Bright Futures school place students in alternative provision, the school remains responsible for the safeguarding of the students placed in that provision. Therefore, schools should obtain a written statement from the provider that they have completed all the necessary vetting and barring checks that are necessary on their staff and need to be satisfied that safeguarding arrangements are effective. The provider should inform the commissioning school of any changes that may impact on the safeguarding of a child. Specific guidance is provided on this in: 'The Effective Use of Alternative Provision – Advisory Note May 2021' (updated in 2025) included for reference as Appendix G.

Visitors

To schools

Planned Visits by Parents/Carers, Agencies and Other Visitors

- All visitors to a school will be asked to sign in at Reception and will be issued with the school's visitor badge;
- All visitors will be issued with the school's leaflet explaining the Child Protection and Safeguarding procedures;
- Visitors should remain in the Reception/Waiting area until the person they are asking to meet arrives. They should not make their own way to meet with a member of staff;

- Any persons who are attending the school to speak in any capacity should ensure they have read and understood the Trust's Visiting Speakers Agreement and previously submitted their signed agreement, a copy of which should be at Reception for when they arrive;
- Visitors must not be unaccompanied during any part of their visit unless a DBS has been seen;
- At the end of the visit, the member of staff meeting the visitor should escort them to the Reception area so they can formally sign out.

Unplanned Visits by Parents/Carers, Agencies and Other Visitors

- All visitors to a school will be asked to sign in at Reception and will be issued with the school's visitor badge;
- A visitor will be asked who they would like to see and the receptionist will see if the person is available;
- If the person is available, procedures will then follow as for planned visits above;
- If the person is not available or cannot be located the visitor will be asked to make an appointment with the person they wish to meet with and to return at that time;
- If the visitor wishes to meet with someone as a matter of urgency, another appropriate member of staff should be located who is available to meet and then the same procedures as above will be followed;
- Parents who are at the school to either deliver or collect their child outside of normal hours will not need to sign in but they should wait in reception for their child to come to them.

Volunteers at School

Volunteers can make a valuable contribution to school life and the wider educational experience of children and young people. Bright Futures will ensure that all volunteers are appropriately assessed and managed in a manner that protects children and complies with statutory safer recruitment requirements.

Before a volunteer begins work within a school, a risk assessment will be undertaken to determine the nature of their role, the level of contact they may have with children and whether the role constitutes regulated activity. The school will then determine the most appropriate level of vetting, supervision and safeguarding oversight required.

The risk assessment will take account of factors including:

- The frequency and duration of contact with children;
- Whether contact takes place on a one-to-one basis or in groups;
- Whether the volunteer will work under supervision;
- The age and vulnerability of the children involved;
- Whether the activity may constitute regulated activity;
- The nature of any activities that take place outside normal school hours, including residential visits and overnight stays.

Where a volunteer is undertaking regulated activity, the school will obtain an enhanced DBS certificate with barred list information before the individual commences the role. Where the volunteer is not undertaking regulated activity, the school will determine whether an enhanced DBS check without barred list information is appropriate and proportionate. Volunteers who have not been subject to the level of checks required for regulated activity will not be permitted to undertake regulated activity and will be appropriately supervised at all times. Appropriate supervision remains an important safeguarding measure but does not replace the requirement for safeguarding risk assessment and safer recruitment consideration.

All volunteers will receive appropriate safeguarding information and guidance, including how to recognise concerns, how to report concerns and the expectations set out within the Trust's safeguarding policies and procedures. Records of safeguarding risk assessments, vetting decisions, DBS checks (where undertaken) and supervision arrangements will be maintained by the school in accordance with safer recruitment requirements.

- **Contractors and third party professionals**

Bright Futures recognises contractors, agency staff, trainee teachers (KCSIE 2026 expressly extends Part Four to trainee teachers and clarifies the shared responsibilities between schools and third-party organisations), external providers and other third-party professionals can play an important role in supporting pupils and school operations. Appropriate safeguarding arrangements must be in place to ensure that children remain safe whenever adults who are not directly employed by the Trust are present on school sites or involved in school activities. Before visitors or contractors undertake work within a school, leaders will consider the nature of the activity, the level of contact with children, whether supervision will be in place and whether any vetting or identity checks are required. This assessment should be proportionate and risk-based.

All visitors and contractors will be required to follow school safeguarding procedures and will be provided with appropriate safeguarding information, including how to report concerns about the welfare of a child or the conduct of an adult. Visitors and contractors who have not been subject to appropriate safeguards for the nature of their role will be accompanied or supervised as determined by the school's risk assessment arrangements. Access to pupils will be restricted where necessary.

Where services are provided by external organisations, leaders will seek assurance that appropriate safeguarding policies, safer recruitment arrangements, staff training and reporting procedures are in place. Safeguarding expectations should be reflected in service-level agreements, contracts or other formal arrangements wherever appropriate. The school will check and verify the identity of contractors and, where appropriate, obtain written assurance from employers that relevant safer recruitment and vetting checks have been completed. Particular attention will be given to self-employed contractors, sole traders and other individuals who may not be employed through a larger organisation.

Before work commences, schools will assess the potential safeguarding risks associated with the work being undertaken and agree appropriate supervision and site-management arrangements. Even where contractors have been appropriately checked and cleared, there should be an

assessment of their suitability to work unsupervised in their initial days with the school. Contractors who have not undergone checks will not be allowed to work unsupervised or engage in regulated activity.

Any safeguarding concerns involving contractors, consultants, visitors or other adults working on behalf of third-party organisations will be managed through the school's safeguarding and allegations procedures and referred to external agencies where appropriate.

Any safeguarding allegation, concern or low-level concern relating to a visitor, contractor, agency worker, volunteer or external provider will be treated seriously and managed in accordance with the Trust's safeguarding and allegations procedures. Appropriate liaison will take place with employers, commissioning organisations, the Local Authority Designated Officer (LADO), the police and other relevant agencies where required.

Contractors will be requested to sign in at Reception and will be given a school ID badge indicating they have permission to be on the site.

Section 7: Staffing and operational issues

It is important that all staff work safely at all times, adhering to all relevant policies and codes of conduct and fulfilling their safeguarding responsibilities.

Safe and Fair Recruitment

The Trust has a 'Safe and Fair Recruitment Policy' that details actions to be taken to ensure that the processes for the recruitment and appointment of staff adhere to standards of best practice in relation to safeguarding. In response to KCSIE (from 2020) the Trust decided to maintain a Single Central Record (SCR) within each academy and one for centrally employed staff rather than having a Trust-wide register. This allows swift local access, management and updating of the SCR. In line with KCSIE (2026) all staff will be added to the SCR (even if they only work for part of the week). Where staff from agencies/supply or third-party employers (eg catering and cleaning) schools must have a formal record that written notification has been received confirming that appropriate checks have been carried out on the individuals.

Also in line with KCSIE (2026), Section 128 checks will be carried out on: local governors, trustees, headteachers, members of school Senior Leadership Teams and departmental heads. If someone has been prohibited from the management of schools, this should appear on their DBS certificate.

Consideration will be given to an online search for relevant, publicly available information on all candidates made a conditional offer of employment and we will advise candidates that this is part of our pre-employment checks. Any concerns will then be explored with candidates. Such searches will be carried out by HR colleagues.

Safeguarding allegations against staff and safeguarding concerns, including 'low-level concerns'

Occasionally there will be allegations made against staff that relate to safeguarding. Allegations sometimes arise over time during which 'concerns' about conduct or behaviour may have become apparent ahead of any specific allegations being made. It is important that concerns are addressed promptly and effectively.

Inappropriate behaviour towards pupils is unacceptable and staff conduct must be beyond reproach. The Trust has guidance for staff on safer working practices in schools and this should be adhered to by all employees. Any complaints about the behaviour of a member of staff from a parent or member of the public will be dealt with in line with the Trust's policy on managing allegations against staff.

If staff are concerned about the conduct of a colleague towards a pupil they should take their concern to the Principal who will follow the correct procedure in line with Trust policies. The culture across the Trust should be one in which people feel empowered to raise concerns about others' conduct in good faith. Sometimes, raising 'low level' concerns about a colleague's conduct can help them to change their behaviour and address the concerns before any harm occurs. In other cases, multiple reports of 'low level' concerns may indicate a pattern of repeated inappropriate behaviour that needs to addressed formally.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

As a last resort, staff are able to call the NSPCC Whistle-blowing Helpline on 0800 028 0285. Any allegations made to a school concerning staff who no longer work for Bright Futures should be referred to the DSL who will, in turn, refer to the Trust's Director of People and Culture. Any historical allegations made regarding a current member of staff should be referred to the DSL for immediate referral to the Principal who will contact the Local Authority Designated Officer. Staff, parents, governors and trustees should be aware that publication of any material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law. Publication includes verbal communication or writing, including content placed on social media sites.

The government organisation responsible for teacher misconduct is, from April 2018, the Teaching Regulation Agency, formerly a division of the National College for Teaching and Leadership.

Supply teachers/agency workers

There may be occasions when allegations are made against an individual who is not a direct employee of Bright Futures, for example, a supply teacher provided by an agency.

Even though the Trust is not the employer, we must ensure that safeguarding allegations are dealt with properly. It is not appropriate for any Bright Futures school or setting simply to cease using a supply teacher as a way of managing safeguarding allegations. In accordance with our policy on managing allegations against staff, a fact-finding exercise needs to be conducted and there should be liaison with the local authority designated officer (LADO) to determine the appropriate process and outcome. Bright Futures will liaise with the agency/employer who will decide on next steps which could be suspension or temporary change of duties whilst any investigation is carried out.

As the employer, supply agencies should be fully involved and co-operate in enquiries from the LADO, police and/or children's social care. It will usually be necessary for the Bright Futures school to take the lead in the investigation because we will have direct access to students and staff and will therefore be best placed to find out the facts. Following the investigation, any employment decisions regarding the agency worker will be led by the agency/employer. The allegations management/strategy meeting (usually arranged by the LADO) will address issues around information sharing, including any intelligence relating to concerns or allegations previously known to the agency/employer that are relevant to the investigation.

It is important that supply agencies are made aware of the Bright Futures policy on managing allegations and a positive relationship established with the HR leads for any agencies we use.

Lettings of school premises

Whenever Bright Futures' premises are used for activities not under the direct supervision of our staff (e.g. out of school clubs run by a separate provider, sports' clubs using pitches etc), school leaders must be assured that any such providers have appropriate safeguarding policies procedures – this may include leaders asking to see such policies and inspecting them. It should be written into any agreements that appropriate safeguarding arrangements must be in place. Lease or hire agreements should include a clause relating to appropriate safeguarding arrangements being in place with the agreement being terminated if safeguarding conditions are breached. Providers' safeguarding arrangements must, as a minimum, meet the guidance 'Keeping Children Safe in out-of-school Settings'. If any safeguarding concerns are raised about external providers with the school, the school will raise them using their normal reporting processes, including informing the LADO as appropriate.

Disqualification by association and childcare disqualification

The guidance on this issue was changed with effect from September 2018. The Trust's approach to this issue is in the updated 'Safe and Fair Recruitment Policy'. In short, disqualification by association now applies in domestic settings and not in schools. However, it still applies to individual members of staff if they work (or volunteer) in a child care capacity and it applies to those involved in wraparound care for children up to 8 years old. Please see paragraphs 340-344 of KCSIE (2026) for further information on this issue. Schools should be aware that OfSTED will check the management of Disqualification under the Child Care Act as part of their school inspections.

Section 8: Confidentiality and Sharing Information

Child protection and safeguarding warrant a high level of confidentiality, not only out of respect for the children and staff involved but also to ensure evidence is not compromised by being released into the public domain.

In the first instance, staff should discuss any concerns only with the DSL who will then decide what other people/agencies should be advised. Information will be disseminated on a 'need-to-know' basis.

Information sharing and data protection

Effective safeguarding depends upon timely, accurate and proportionate information sharing. Bright Futures recognises that information sharing is essential to identifying, assessing and responding to safeguarding concerns and to ensuring that children and young people receive the right help at the right time. No practitioner should assume that somebody else will share information that may be critical to keeping a child safe.

The Trust will ensure that safeguarding information is shared lawfully, fairly, proportionately and in accordance with data protection legislation. The Data Protection Act 2018 and UK GDPR do not prevent information sharing where it is necessary to safeguard and promote the welfare of children.

When sharing safeguarding information, staff should ensure that information is accurate, relevant, necessary, up to date and shared without unnecessary delay. Information should be clearly presented and appropriately contextualised so that recipients can fully understand the nature of any safeguarding concerns, risks, vulnerabilities, protective factors and actions already taken.

The DSL will ensure that safeguarding information is transferred securely and promptly when children move schools, colleges, alternative provision settings or other educational placements. Where appropriate, direct contact should take place between safeguarding leads to ensure that significant concerns, risks, support arrangements and safety plans are fully understood.

When deciding whether information should be shared, the welfare and safety of the child will remain the paramount consideration. Decisions to share or not share information, together with the rationale for those decisions, should be recorded appropriately.

Child protection and safeguarding information will be stored and handled in line with the relevant data legislation. It will be:

- Processed for limited purposes;
- Adequate, relevant and not excessive;
- Accurate;
- Kept for the statutory time limit and no longer (this will vary and advice should be sought before any data of this nature is destroyed);
- Processed in accordance with the subject's data rights;
- Kept securely.

Each school's Child Causing Concern forms and any other relevant information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Child protection information will be stored separately from the pupil's general school file which will be 'tagged' to indicate that separate safeguarding information is held elsewhere.

The Trust's Data Protection Policy does not prevent school staff from sharing information with relevant agencies where that information may help to protect a child. This policy is available to all staff and parents on the school's website.

Decisions about sharing or not sharing information

There are times when it is appropriate to share information in order to enable effective safeguarding. There are also times when it is necessary to withhold information in order to prevent a person coming to further harm or to avoid a criminal act. For example, a parent who is facing charges for serious violence against a child may well want details from the school of where the child is living. It is entirely appropriate in circumstances like this to withhold data even from someone with parental responsibility. The decision to share or to withhold information should be briefly documented with a rationale as to why the decision was taken at the time.

In contentious cases, the DSL may wish to seek advice from the Trust's Data Protection Officer. As ever, the safety and well-being of the child are always the paramount concerns.

Section 9: Training and development

Staff, Local Governor and Trustee Training

It is important everyone receives training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. It is good practice to revisit training/development on a regular basis, especially for teams directly involved in safeguarding. The Trust issues a weekly update for DSLs highlighting areas of current interest. This helps us to remain professionally curious. Training for every member of staff employed by the Trust and all Local Governors and Trustees will be, as minimum:

- Appropriate annual training provided by the Trust/school that updates on national or local changes. This will include online safety and an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring, ensuring that staff understand the importance of filtering and monitoring systems and that their effectiveness is monitored. Staff need to know how to escalate concerns if they find children's online activity is giving rise to concerns (e.g. accessing inappropriate material, obsessive interest in subjects that might suggest radicalisation;
- Ensuring that they understand their role and how to undertake their responsibilities as set out in Part One of KCSIE 2026;
- Ensuring that they are aware of the threats, risk and vulnerabilities associated with radicalisation; are aware of the process of radicalisation and how this might be identified early on; how support can be provided to ensure children are resilient and able to resist involvement in radical or extreme activities;
- They are aware of the increased risk to abuse of certain groups, including students with SEN and disabilities, looked after children, those formerly in care, young carers, children as witnesses in the legal system, children missing from education, children with family members in prison;

- Staff training will include awareness of safeguarding considerations relating to children questioning their gender, including the need for a child-centred approach, appropriate information sharing, parental engagement and professional curiosity regarding wider safeguarding risks;
- A recognition of online contexts in relation to safeguarding including specific risks in relation to digital platforms and the way in which harm and abuse can happen generally via digital means;
- Staff will receive regular updates regarding cyber security risks, including phishing, password security, data protection responsibilities, safe use of technology and the identification of cyber incidents that may have safeguarding implications;
- All staff will receive training and updates regarding filtering and monitoring arrangements, their role in identifying online safeguarding concerns and the processes for escalating concerns where filtering or monitoring systems identify risks to children;
- Further training as appropriate for those staff, Local Governors and Trustees with more safeguarding responsibilities;
- New staff, Local Governors and Trustees should receive safeguarding training within their first half-term of service. Their general induction should familiarise them with the Child Protection and Safeguarding Policy, the school's safeguarding procedures and contact details for the school's DSL and DDSL. Supply staff and other visiting staff will be given the school's leaflet for safeguarding for visiting staff. All schools will follow the Trust Safe and Fair Recruitment Policy and, where appropriate, staff, local governors and trustees will complete the Safe and Fair Recruitment training. Online safeguarding for governance is available via GovernorHub/The Key;
- Training for those involved in governance must equip them to provide strategic challenge, testing the robustness of safeguarding policies and practice;

Appendix A: WHAT TO DO IF YOU ARE CONCERNED ABOUT A CHILD'S WELFARE - TAKING ACTION

Any child could become a victim of abuse. Staff should always maintain an attitude of 'it could happen here'. Key points for staff to remember for taking action are:

- In an emergency take the action necessary to ensure the safety of the child – this could mean dialling 999;
- Report your concern as soon as possible to the DSL/DDSL and certainly no later than the end of the day;
- Do not start your own investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- Complete a Concern form;
- Seek support for yourself through the correct procedures if you are distressed.

What to do if you are concerned about a pupil's welfare

There will be occasions when staff may suspect a pupil may be at risk but have no 'real' evidence: the pupil's behaviour may have changed; their expressive work may demonstrate extreme ideas; they may write stories or poetry that reveal confusion or distress; physical (but inconclusive) signs may have been noticed.

In these circumstances staff should try to give the pupil the opportunity to talk to them. The signs could be due to a variety of factors. For instance, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. It is fine for staff to ask the pupil if they are OK or if they can help in any way. Staff should use the school's Concern Form to record these early concerns. If the pupil does begin to reveal they are being harmed staff should follow the school's procedures. If a member of staff is still concerned following the initial conversation, they should discuss their concerns with the DSL/DDSL. Any concerns which do not meet the threshold for child protection intervention will be managed through interventions such as Family Help / CAF process.

If a child chooses to disclose abuse to you

It takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; they may believe, or have been told, the abuse is their own fault. Sometimes a child may not be aware that what is happening to them is abuse.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member must let the pupil know they are obliged to pass the information on. Staff must not keep secrets

and should inform the pupil that they cannot keep the information confidential. During any conversation with the pupil staff should:

- Allow the pupil to speak freely;
- Remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- Give reassuring non verbal cues or words of comfort such as: 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- Not be afraid of periods of silence during the conversation – remember how hard this must be for the pupil;
- Under no circumstances ask investigative questions – such as how many times has something happened, whether it happens with siblings too and what does the pupil's mother/father think about it;
- Tell the pupil at an appropriate time you must pass any information on and explain to whom and why;
- Not automatically offer any physical touch as a comfort – this may be anything but comforting to a child who has been physically abused;
- Avoid admonishing the child for not disclosing anything earlier. Saying things such as 'I wish you had told me about this when it started' or 'I can't believe what I am hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong;
- Tell the pupil what will happen next;
- The pupil may agree to go to see the DSL, otherwise let them know someone will come to see them before the end of the day;
- Report the conversation verbally to the DSL, even if the pupil has promised to do so themselves;
- Write up the conversation as soon as possible on the Record of Concern Form and make sure this is handed to the DSL/DDSL;
- Seek support if they feel distressed by the conversation.

What happens next?

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively. The DSL/DDSL will make contact with the parents in the event of a concern, suspicion or disclosure. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought by the DSL/DDSL from the relevant children's social care services. It is always possible to seek advice from children's social care when considering a referral.

Referral to Children's Social Care

The DSL/DDSL will make a referral to children's social care if it is believed that a pupil is suffering, or is at risk of suffering, significant harm. The pupil (subject to their age and understanding) and the parents will be told a referral is being made unless it would increase the risk to the child to do so. Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

Reporting directly to child protection agencies

Staff should normally follow the reporting procedures outlined within this policy. With the exception of genuine emergencies, the reporting lines should be through the DSL/DDSL. However, they may also share information directly with the relevant children's social care, the police or the NSPCC if:

- The situation is a genuine emergency with imminent risk of significant harm to the child;
- The DSL/DDSL and the Principal/Head of School are all unavailable;
- You are convinced a direct report is the only way to ensure the pupil's safety;
- For any other reason they make a judgement that direct referral is in the best interests of the pupil.

Appendix B: RECOGNISING ABUSE, NEGLECT AND EXPLOITATION

Abuse

Abuse is defined as a form of maltreatment of a child. This can be by inflicting actual harm or by failing to act to prevent harm. Children can be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). Children may be harmed by witnessing the ill treatment of others as is often the case in domestic abuse.

Children can be abused by adults or by another child or children.

Where abuse takes place, there is usually an imbalance of power between the perpetrator(s) and the victim(s), perhaps through age, dominance of personality, social influence or status, financial means or physical strength.

Neglect

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

Categories of abuse and neglect

Types of abuse include:

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

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

Sexual abuse: Involves forcing or enticing a child to take part in sexual activities not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production/distribution of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse as can other children.

Neglect: Even an unborn child can suffer neglect, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of abuse

Physical signs can define some types of abuse. For example, bruising, bleeding or broken bones resulting from physical or sexual abuse or injuries sustained whilst a child has been inadequately supervised. The identification of physical signs is complicated as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are aware of the range of behavioural indicators of abuse and report any concerns to the Designated Senior Lead (DSL) or Deputy Designated Lead (DDSL) within their school. It is the responsibility of staff to report their concerns, but it is not their responsibility to investigate or decide whether a child has been abused. A child who is being abused, neglected or exploited may:

- Have bruises, bleeding, burns, fractures or other injuries;
- Show signs of pain or discomfort;
- Keep arms and legs covered, even in warm weather;
- Be concerned about changing for PE or swimming lessons;
- Look unkempt, dirty and uncared for;
- Change their eating habits;
- Have difficulty in making or sustaining friendships;
- Appear fearful and anxious;
- Be reckless with regard to their own, or another's safety;
- Self-harm;
- Frequently miss school, arrive late or leave the school for part of the day;
- Show signs of not wanting to go home;

- Display a change in behaviour, from quiet to aggressive or happy-go-lucky to withdrawn;
- Challenge authority;
- Become disinterested in their school work;
- Start to use 'scripted' language in relation to particular extremist views;
- Be constantly tired or preoccupied;
- Be wary of physical contact;
- Be involved in, or particularly knowledgeable about, drugs or alcohol;
- Display sexual knowledge or behaviour beyond that normally expected for their age;
- Acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL/DDSL to decide how to proceed. It is very important staff report their concerns to the DSL/DDSL – they do not need 'absolute proof' the child is at risk. It is always better to share your concerns or 'nagging doubts' than to say nothing.

Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Appendix C: EXEMPLAR REPORT FORM (Whether electronic or hard copy, the same principles apply)

STRICTLY CONFIDENTIAL: SAFEGUARDING CAUSE FOR CONCERN	
Full name of child (subject of concern): *Safia Hanlon*	
DoB (if known): *Not known – on MIS but can't access*	
Form/class/group: *9DB*	
Name of reporting staff member: *Dawn French, form tutor 9DB*	**Contact no:** *Ext 08176*
Factual description of concerns (what you have seen, heard or been told, using child's own words as far as possible) *During form time today Safia asked to speak to me privately. I asked her to wait until the others had left and she disclosed that her dad has started to hit her mum on a regular basis. She said she is 'really worried' and 'doesn't want to go home'. She stated, 'He will kill her, Miss'. Safia cried and said, 'Someone needs to help us. He's getting worse'.* *I explained to Safia that I would share this with the DSL and that someone would speak to her today. I offered her the chance to see the Counsellor but she wanted to go to English. Told her she could come and find me or see the Counsellor any time today if she wanted.* **Signed/date/time completed** *D French/26 Sept 2025/0945*	
Any additional documents attached (e.g. skin map/screenshot):	*No*

Action and communications log		
Date/time	**Action and rationale/communications**	**Signed**
26/09/25 0930	**DSL/DDSL informed and case discussed:** *emailed DSL and spoke to her on phone; she asked for completed form to be sent password protected – sent 0950*	**DF**
26/09/25 0958	**Children's social care contacted:** *Spoke to contact, assessment & referral team, Walford CS with concerns to seek advice as risk of harm appears high. Family known to Children's Services. Allocated worker to call back.*	**JJ**
	Other agencies notified:	
26/09/25 1130	*Call from Dawn Lewis, social worker. Police aware of case. Been called out twice this week to the home but mum will not make formal complaint. DL to visit home today to speak to mum about children's welfare and assess risk (initial assessment started). School to monitor but not to contact parents at this stage. DL to call JJ tomorrow.*	**JJ**

Appendix D: DESIGNATED SAFEGUARDING LEAD

Each school within the Trust will appoint an appropriate member of their Senior Leadership Team as a Designated Safeguarding Lead (DSL) who will take lead responsibility for Child Protection and Safeguarding within that school. The DSL will be given the time, funding, training, resources and support to provide advice and support to all staff and local governors within the school on safeguarding matters. Each academy will also appoint at least one Deputy Designated Safeguarding Lead (DDSL) who will be trained to the same standard as the DSL and will take over any duties of the DSL if they are absent from the academy for any reason.

The DSL can delegate some responsibilities to the DDSL, and, in practice, the DDSL will often manage cases operationally. However, the ultimate lead responsibility for child protection within the academy remains with the DSL. The DSL should encourage a culture amongst all staff of listening to children and taking account of their wishes and feelings in any measures the school may put into place to protect them. The child's best interests should always be at the centre of decision making.

Responsibilities of the Designated Safeguarding Lead

The DSL is a significant leadership role. With other senior leaders and local governors, the DSL needs to foster a *whole-school culture* of safeguarding that is more than procedural compliance. Annex B of KCSIE (2026) details the full scope of practice of the DSL. From 2023, the DSL's lead responsibility for safeguarding and child protection includes online safety and understanding the filtering and monitoring systems in place in the school. They will need to liaise with IT teams to ensure that filtering is effective, to agree how monitoring will work and to balance both with allowing students and staff access to appropriate curriculum materials.

Referrals

It is the responsibility of the DSL to refer all of the following:

- Cases of suspected abuse to the Local Authority Children's Social Care;
- Cases of a radicalisation concern to the Channel programme;
- Cases of a safeguarding nature concerning staff to the Principal;
- Cases where a crime may have been committed, including cases of FGM, to the police.

The DSL should ensure parents/carers of school's pupils are aware that referrals about suspected abuse or neglect may be made and the role of the school in any such referral.

Working with others

Effective safeguarding is always a team effort. The DSL is the point of contact with the three statutory safeguarding partners. The DSL should liaise and work with the following groups on a regular or 'as required' basis:

- Principal to inform them of any issues, caseloads, patterns and prevalence of safeguarding incidents and, in particular, keep them updated on any ongoing enquiries under Section 47

of the Children Act 1989 and/or police investigations. Be aware of and prepared to enforce the requirement for children to have an Appropriate Adult present if being interviewed by police under PACE;

- Case Managers and Designated Officers at the Local Authority on any child protection concerns;
- Attendance Officers (or equivalent) in their academy;
- Promote good engagement with parents and carers;
- Inter-agency groups, including taking part in strategy discussions and meetings and contribute to children's assessment. The DSL should also support any other staff who are involved in any such meetings with inter-agency groups;
- Local Safeguarding Children's Board (LSCB) (to become 'Local Safeguarding Partnerships');
- All staff and local governors within their academy on any matters of safety and safeguarding;
- Social Work Teams/police over suspected cases of abuse;
- Child Protection Conferences and Core Groups in order to attend and/or submit a school child protection reports;
- Take part in peer reviews and audits related to safeguarding
- Liaise with staff, particularly pastoral staff, school nurses, IT technicians, SENDCos and senior mental health leads, on all matters of safety and safeguarding;
- Liaise specifically with mental health leads where safeguarding concerns relate to mental health, and specifically where there may be evidence of adverse childhood experiences impacting on mental health;
- Support parents and carers in safeguarding their children, particularly those dealing with increased vulnerabilities or where there are specific safeguarding/child protection concerns;
- Be their school's representative on the Trust's Safeguarding Group, and work with each other to ensure the Child Protection and Safeguarding Policy is reviewed annually (as a minimum); procedures and implementation are updated and reviewed regularly and all staff and governors are aware of any new versions of the policy.

Training

The DSL (and any DDSLs) will undergo formal training to provide them with the knowledge and skills required to carry out their role. This training should be updated at least every two years.

The DSL will undertake Prevent training in order to:

- Provide advice and support to staff on protecting children from the risk of radicalisation;
- Support their academy with regards to the requirements of the Prevent duty;
- Support staff who come to them with any child protection or safeguarding concerns and guide them through any appropriate process.

In addition to formal training, the DSL (and any DDSLs) will keep their skills and knowledge updated at regular intervals. This should be done when required, but at the very least annually, in order to allow them to keep abreast of any developments and regulations relevant to their role.

The DSL should ensure they are conversant with the following:

- The assessment process for providing family help and intervention, e.g. through locally agreed common and shared assessment processes such as family help assessment;
- How local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Their academy's Child Protection and Safeguarding Policy;
- Specific needs within their academy of children in need, those with special educational needs, young carers and any other particularly vulnerable groups;
- How to keep detailed, accurate and secure written records of concerns and referrals (compliant with the Data Protection Act (2018) and GDPR);
- How to obtain access to resources and attend any relevant courses;
- How to identify, understand and respond to specific needs that can increase the vulnerability of children;
- Specific harms that can put children at risk;
- The long term harm of adversity and trauma on behaviour, mental health and how to address this;
- The difficulties children may have in approaching staff about concerns where there is an asymmetrical relationship, and how to build a culture of openness and confident communication;
- The specific needs of children with additional vulnerabilities;
- Notifications relating to children placed in temporary accommodation are reviewed promptly and that appropriate safeguarding, welfare and educational support arrangements are implemented and monitored;
- The DSL will work with leaders and technical specialists to understand the filtering and monitoring systems in operation, review their effectiveness, identify safeguarding trends arising from monitoring activity and ensure appropriate actions are taken where risks are identified;
- Ensure that concerns relating to children questioning their gender are considered within safeguarding and wellbeing processes and, where appropriate, are supported through multi-agency working, Family Help arrangements and ongoing review;
- Ensure that the needs of children affected by parental imprisonment or custody are considered within safeguarding, attendance, wellbeing and educational support arrangements.

The DSL should lead on child protection and safeguarding training and ensure:

- All staff and governors in their academy receive introductory safeguarding training including how filtering and monitoring systems work in the school;
- Their school can demonstrate all staff have received relevant Child Protection & Safeguarding, Prevent and Anti-Radicalisation training;
- Staff are made aware of any changes and updates to local authorities' policy and procedure;
- All staff and governors are aware of the arrangements for the management, reporting, referral and implications of child-child abuse;

- Students and staff are aware of how to stay safe, including specifically in online contexts;
- Policy and procedures in school are considered in terms of safeguarding implications, including online safety;
- All staff, local governors, temporary staff and visitors are aware of the academy's Child Protection and Safeguarding Policy and its procedures are implemented and followed in their academy. This includes providing advice regarding safeguarding risk assessments for volunteers and ensure that any safeguarding concerns arising from volunteer arrangements are responded to appropriately.

Record Keeping and Information

Advice on the management of case 'files' is given in Annex B of KCSIE (2026)

As part of their role the DSL should:

- Maintain accurate and relevant records for all children for whom there are safeguarding concerns along with individual Child Protection files for children who are the subject of a Child Protection Plan. Ensure the up-to-date version of the Child Protection and Safeguarding Policy is available on the school's website, along with any other relevant safeguarding information;
- Ensure all provision of information to pupils/students are fit for purpose, fully understood and used appropriately.

Transfer of Child Protection Files

When a pupil/student leaves the school, the DSL should work with the Head/Principal and relevant people responsible for the management and protection of data to:

- Ensure the child protection file is transferred to the new school or college as soon as possible and always with 5 days (in year transfer) or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file under strict confidential cover. If not hand delivered to a local school, this should be sent by registered post to a named person, preferably the DSL of the receiving school and should be tracked that it has been received and signed for. If the file type can be saved electronically, it could be sent to a specific, named person (preferably the DSL) via email but only if it can be password protected with the password being sent in a separate email;
- Ensure the file is checked before sending to ensure all papers are in order and the correct information is enclosed. Ensure that the file meets the required standards of the Data Protection Act (2018), including the General Data Protection Regulation;
- Keep a copy of the child protection file for school records. This should be securely archived until the pupil/student reaches the age of 25 when it can be destroyed;
- Ensure a receipt for the file is received from the receiving school and kept in the academy's copy file.

Where safeguarding concerns are known, the DSL should consider whether additional contextual information, risk assessments, support plans, behaviour plans, attendance

concerns, online safety concerns or other relevant safeguarding information should be shared directly with the receiving setting to support continuity of safeguarding and welfare arrangements.

Where a child is considered vulnerable or there are ongoing safeguarding concerns, receipt of safeguarding records should be actively confirmed and followed up where necessary.

Promoting educational outcomes

The DSL has an important role in promoting educational outcomes by sharing information with other school colleagues about the welfare, safeguarding and child protection issues that children are experiencing or have experienced. This is particularly important for the most vulnerable groups, including children with a social worker. This includes ensuring that staff are familiar with who the 'vulnerable' groups of children are, and that any specific barriers to progress and achievement are overcome. It is important that there is a culture of high aspirations for this group of children. The DSL will be able to offer advice on any adjustments that may need to be made to ensure these children are well supported and that aspirations remain high.

Availability

The DSL should be available during regular academy hours for members of staff to discuss any safeguarding concerns. The DSL should liaise with senior staff at their academy to arrange adequate and appropriate cover arrangements for any out of hours / out of term activities. In some circumstances, by agreement, availability via telephone and/or secure virtual meeting platforms is acceptable.

In the absence of the DSL, Bright Futures will ensure that appropriate safeguarding leadership arrangements are in place at all times. The DSL will have overall responsibility for safeguarding and child protection; however, robust arrangements will be established to ensure continuity of safeguarding provision during periods of absence, leave, illness, training, vacancy or other circumstances in which the DSL is unavailable:

- Maintain effective contingency arrangements to ensure safeguarding leadership, decision-making, information sharing and safeguarding responses remain operational during periods of absence, vacancy or organisational change;
- Each school will appoint one or more appropriately trained Deputy Designated Safeguarding Leads (DDSLs). During any period when the DSL is unavailable, a DDSL will assume responsibility for safeguarding and child protection matters and will have the status, authority and training necessary to carry out the role effectively;
- Schools will ensure that safeguarding concerns can be reported and responded to without delay. Staff will be made aware of safeguarding contacts, reporting arrangements and escalation procedures, including arrangements for periods when the DSL is absent;
- Safeguarding systems, records and communication arrangements will be maintained in a manner that enables safeguarding activity to continue effectively during periods of staff absence. This may include shared safeguarding files, secure safeguarding communication

systems, dedicated safeguarding email arrangements and appropriate access to records for authorised safeguarding personnel;

- Where both the DSL and DDSLs are unavailable, schools will ensure that a suitably trained senior leader is identified to provide safeguarding oversight and to seek advice from external safeguarding partners where necessary. Such arrangements will be documented within local school safeguarding procedures and communicated to staff;
- The Trust will ensure that safeguarding responsibilities are never suspended due to staff absence and that children, families and staff always have access to an appropriate safeguarding professional.

Appendix E: THE LOCAL GOVERNING BODY AND THE CHILD PROTECTION & SAFEGUARDING GOVERNOR

Child Protection and Safeguarding are an intrinsic part of any Trust school. The core principles should be to ensure the health, safety and welfare of any persons within that academy.

The Local Governing Body (LGB) has a specific role to undertake with regard to Child Protection and Safeguarding in accordance with this Policy.

Responsibilities of the Local Governing Body

Each LGB should:

- Appoint one Governor as the Child Protection & Safeguarding Governor;
- Ensure every Governor on the LGB receives appropriate annual training to make them fully aware of any changes to legislation / guidance / local and national Child Protection and Safeguarding procedures and issues. The training will be in line with that received by all staff members but will include an element that enables governors to provide strategic challenge, testing the robustness of policy and procedures. All LGB members to read Part One of KCSIE (2026);
- Ensure that any Governors who are involved with staff recruitment have completed appropriate safer recruitment training or that someone with that training is on every appointment panel;
- Work with the school's DSL to ensure a complete and up-to-date record is kept of any and all Child Protection and Safeguarding training for all Governors;
- Liaise with the Principal and Senior Leadership Team to be assured that a culture of vigilance and safeguarding permeates all aspects of the academy;
- Provide support and challenge to ensure compliance with procedures and processes required in KCSIE (2026) and any subsequent updates, and any local procedures issued by the Local Children's Safeguarding Board. This may include looking at headline data on prevalence of safeguarding incidents;
- Ensure the academy-specific safeguarding policy is reviewed and approved on a regular basis (at least annually), and support and challenge to ensure academy compliance.

Responsibilities of the child protection and safeguarding governor

It is the responsibility of the Child Protection and Safeguarding Governor to:

- Support the DSL by meeting with them and their team at least once a term;
- Report on meetings with the DSL/DDSL to the LGB and highlight any issues/concerns in order for the LGB to be fully informed on Child Protection and Safeguarding within their school;
- Check the Child Protection and Safeguarding Procedures in the academy in liaison with the DSL and DDSL to ensure that they are being consistently followed in practice;

- Ensure statutory requirements are in place and report to the LGB on the use of resources to promote effective safeguarding, including any pressures that may create risk;
- Be assured that arrangements for the most vulnerable groups of children are in place and secure and that their progress and outcomes are properly tracked;
- Be assured that safeguarding arrangements for students accessing alternative provision or part-time timetables are secure;
- Check that the curriculum is used well to promote safeguarding, paying particular attention to local issues;
- Check that appropriate filtering and monitoring systems are in place to protect children online and be assured that the systems are effective, proportionate, regularly reviewed and capable of responding to current and emerging safeguarding risks.

Appendix F: THE BOARD OF TRUSTEES AND THE CHILD PROTECTION & SAFEGUARDING TRUSTEE

Child Protection and Safeguarding are an intrinsic part of the Trust and the core principles should be to ensure the health, safety and welfare of any persons in the Trust, in any capacity. The Board of Trustees is the ultimate accountable body for the Trust.

Responsibilities of the Board of Trustees

The Board should:

- Appoint one Trustee as the Child Protection & Safeguarding lead;
- Ensure every Trustee receives appropriate annual training to make them fully aware of any changes to legislation / guidance / local and national Child Protection and Safeguarding procedures and issues. This will be carried out by the Trust Safeguarding Team;
- Ensure that any Trustees who are directly involved with staff recruitment complete the online Safer Recruitment training every three years;
- Ensure an up-to-date record is kept of any and all Child Protection and Safeguarding training for Trustees;
- Liaise with the appropriate people in academies to ensure that a culture of vigilance and safeguarding that permeates the Trust;
- Receive regular, high level safeguarding reports from the Chief Executive Officer and training that enables the Board to offer strategic challenge, testing the robustness of policies and procedures.

Responsibilities of the Lead Trustee for Child Protection and Safeguarding

It is the responsibility of the Child Protection and Safeguarding Trustee to:

- Undertake appropriate induction and update training;
- Ensure that when Trustees are involved in recruitment, at least one member of the panel has completed Safer Recruitment training;
- Attend meetings with Designated Senior Leads (DSL) within the Trust as a member of the Trust Safeguarding Team;
- Provide support and challenge at the Board in response to safeguarding reports provided by the CEO and Trust Safeguarding Lead;
- Read and engage with Part One of Keeping Children Safe in Education 2026
- Check that appropriate filtering and monitoring systems are in place to protect children online and be assured that the systems are effective, proportionate, regularly reviewed and capable of responding to current and emerging safeguarding risks.

Appendix G: Alternative provision

BRIGHT FUTURES EDUCATIONAL TRUST

The Effective Use of Alternative Provision – Advisory Note May 2021 (amended 2025)

Introduction

As part of the planning for individual students to receive a high quality education, there are times when provision 'off site' from the main school may be used for some or a substantial amount of a child's education.

Decisions about using 'alternative provisions' must be taken with great care and always with the best interest of the student at the centre of the decision-making.

The primary concern needs to be about the safety and safeguarding of the young person. This includes making sure that appropriate and robust procedures are in place around promoting the student's attendance, dealing with absence, behaviour and the safe recruitment/supervision/training of staff.

Thereafter, it is important to be assured that the provision is offering a suitable curriculum and an appropriately high standard of education, meeting the student's needs.

Additionally, any 'contracting' with alternative provision providers is governed by the Trust's Delegation Framework and financial and procurement operating procedures.

DfE Guidance

Alternative provision is governed under the Independent School Regulations 2019 but guidance was updated in 2025.

Any institutions making provision for the education of students of compulsory school age must be registered as a school if:

- It provides full time education for 5 or more students.
- It provides full time education for 1 or more students with an education, health and care plan.
- It provides full time education for a child in the care of the local authority.

What constitutes 'full time'?

There is no legal definition of 'full time education'. The guide used whether the provision provides 'all or substantially all' of a child's education.

This could be calculated on:

- The number of hours per week (including breaks and independent study)
- The number of weeks in a term/academic year provided.
- The day(s) of the week that the provision is made.

- Whether or not attendance at the provision effectively precludes the possibility of full time education happening elsewhere.

As a guide, if a student is in alternative provision for 18 hours a week (including breaks and independent study time) this is considered 'full time'.

Ofsted – the inspection framework is scheduled to change during 2025/26

As part of the Section 5 school inspection framework, inspectors are required to satisfy themselves of the safety and quality of any off site provision and need to be satisfied that the school is taking responsibility for students educated (partly or wholly) off site.

In particular, inspectors will want to know how leaders are assuring themselves that children are safe in off site provision and that their educational, personal and social needs are being well met (including any special educational needs).

If the school is using unregistered provision, how does this impact upon safeguarding?

How effective are the school's process for quality assuring the provision?

Specifically, inspectors will explore and will need to be convinced about:

- Why leaders have chosen off site provision as the best option for the child?
- Have appropriate checks been made about the registration status of the provision (e.g. are leaders satisfied that a provision is not acting illegally by providing full time education as described above without being registered as a school?)
- If unregistered providers are used how does this impact on safeguarding and how are leaders assuring themselves that the provision meets high standards of safeguarding in every respect?
- How are leaders satisfying themselves of the quality of the curriculum offer, attendance and behaviour and provision to promote personal development?
- If the curriculum in a temporary placement is narrow, how is the school planning for the student's return to the broader curriculum offer?
- Students in AP are more likely to be out of education, employment or training after school – so what is the school doing to ensure students are accessing good careers/progression advice and support, including employer encounters?

If a school uses a provider that is not registered, the inspector must contact the duty desk so that staff can notify Ofsted's unregistered schools team. Following the inspection, the team will determine if they need to take further action because there is reasonable cause to believe that the setting is operating as an unregistered school.

A school is likely to be judged inadequate for leadership and management if:

- it is making ineffective or inappropriate use of alternative provision
- it is using inappropriate alternative provision
- leaders have not taken the necessary steps to assure themselves of the suitability of a provision, including its COVID-19 safety arrangements
- leaders are not aware of how many of their pupils attend alternative provision
- leaders are not taking responsibility for their pupils who attend alternative provision.

Practical implications

The regulations are not new but do appear to be receiving greater attention in inspection. They are designed with two important aims: the safety of students and the quality of education they receive.

Example 1

Student A in Year 10 is sent to alternative provision for one day a week to access specialist provision in catering. The provider offers no full-time education placements. The school has carried out full due diligence on the provider ensuring that safeguarding policy, practice and cultures are in place, including good supervision and training for all staff. Health and safety certificates are all up to date in the premises and Covid-secure procedures are all in place following rigorous risk assessment. All checks are carefully recorded in a standard format held by the school.

Behaviour and attendance procedures are robust and any breaches are promptly reported to the school and followed up. The specialist tuition in catering is helping Student A to make good progress; they are on track to achieve a Level 2 qualification. The impact of positive engagement in the alternative provision is seen in improved attendance and progress at school.

Communication with the school is good and any matters of concern or celebration are shared between key contacts at the school and the provision. Announced and unannounced visits are carried out by the school to the provision so that there are assurances that safeguarding is consistent, proactive and part of the way the provision works.

Because the provision has no students for 'all or substantially all' of their education it does not need to register as a school. This means that extra care needs to be taken to be sure that its policies, procedures and culture meets the high standards that would be expected in school.

Example 2

Student B is in Year 11 and has a history of non-attendance and poor behaviour at school. They have had several fixed term exclusions and are at risk of permanent exclusion. There is a concern that the student has unidentified special educational needs and has very low levels of literacy. As a last resort the school has set up an arrangement with a local alternative provider. The provision is specialised and takes no more than 4 students at any time. The student attends the provision 20 hours a week in the autumn term. This, however, is part of a carefully constructed and monitored plan for the student to return to main school on a gradual basis.

All due diligence on the provision has been conducted and is actively updated with a special focus on safeguarding. Announced and unannounced checks are carried out by staff at the school and there is good, regular, planned communication with the provision.

The curriculum offer at the provision focuses very much on literacy. Teaching and learning are imaginative, innovative and well planned and are impacting on the student's progress and confidence. If progress continues, Student B is likely to be able to enter and achieve some GCSEs. They are accessing counselling at the provision and are involved in sports leadership. They attend the Duke of Edinburgh Award activities at the main school site half a day a week. Staff in school and the provision have attended joint training on the use of 'Lexia' provided by specialists in the school.

A review meeting takes place weekly when the student's progress towards the return to school is considered with a plan to increase the split between the AP and school provision shifting in favour of the school by December. The school SENDCo is central to the review meetings.

Because the provision has less than 5 students it does not need to register as a school. Student B is only attending for 'all or substantially all' of their education as part of a clearly documented and monitored plan to get them back to main school and only over one term – so taken over an academic year they will not be in the provision for 'all or substantially all' of their education.

Example 3

Student C is in Year 10. They are considered a 'school refuser' and have been involved in drug taking, drug use and low level criminality. They live with their grandmother who also cares for her disabled husband and looks after 2 younger grandchildren.

The school has managed to re-engage Student C by placing them at a vocational provider 'Moto-Tex'. MT take some of the most challenging students in the area and have an excellent track record in getting students re-engaged and teaching literacy and basic maths in the context of technical and vocational learning. The school has carried out rigorous and robust due diligence on safeguarding and health and safety at the Moto-Tex centre. Staff at the school regularly visit the centre and check on the curriculum and safeguarding.

Student C's grandmother and youth offending team worker are delighted with his engagement and progress in education – he is a changed person, much better behaved at home and in the community.

The school originally commissioned 10 hours per week from Moto-Tex and 10 hours from the local college. Student C never attended the college placement but would hang around outside Moto-Tex where he has developed excellent, constructive relationships with the staff. Accordingly, the school replaced the college placement with a further 10 hours at Moto-Tex. The school had not realised that they were effectively sending a student to unregistered provision.

In a Section 5 inspection of the school, the HMI reported to the Ofsted help desk that a student was attending Moto-Tex full time and it appears that the centre is not registered at school. This has implications for Moto-Tex who are legally responsible for registration. It also has implications for the school because they are knowingly sending a student full time to a school that is unregistered and this has to be considered under the leadership and judgements for the school.

Keeping a record

Where due diligence is undertaken on a provider to give assurances around safety, quality and safeguarding arrangements, policy, procedures and culture, this must be formally recorded. If visits are undertaken to a setting this should be recorded.

The relationship with providers is crucial in ensuring that there is a free exchange of information about students' progress. In addition, there needs to be a formal agreement and procedures covering how attendance, progress, engagement and behaviour will be communicated between the provision and the school with clarity about who will take what actions to address any difficulties (e.g. what happens if a student fails to attend on a particular day? What are the escalation processes?)

Where key decisions are taken (e.g. to extend the time a student remains in alternative provision) the rationale for that decision needs to be formally recorded so that the 'story' of the student can be clearly understood.