BATH & WELLS
Multi Academy Trust

'That they may have life, life in all its fullness' John 10:10

Child protection and safeguarding policy

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Child Protection and Safeguarding Policy

[Name of Academy]

Date	Action	Owner	Approval
Sept 2025	**Revised in line with KCSIE 2025**	**Board of Trustees**	**Approved 10th September 2025**
Next review due Sept 2026			

1 Our strong safeguarding culture

1.1 Why it is important

1.2 The definition of 'safeguarding and promoting' the welfare of children' was updated to reflect changes made in 'Working together to safeguard children (2023)' and Keeping Children Safe in Education 2025 to include: providing help and support to meet the needs of children as soon as problems emerge and protecting children from maltreatment, inside or outside the home, including online.

1.2.1 Safeguarding is everyone's responsibility, and it is the duty of the [academy/trust] to safeguard and promote the welfare of children. This is our core safeguarding principle.

1.2.2 In adhering to this principle, we focus on providing a safe and welcoming environment for all of our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All of our children have equal rights to support and protection.

1.2.3 One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers and trustees and governors, all of whom are trained upon its contents and on their safeguarding duties. Contractors will be informed of this policy and required to uphold it in full. We update this policy at least annually to reflect changes to law and guidance and best practice.

1.2.4 This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

1.3 What it means for our pupils

1.3.1 In line with Working Together to Safeguard Children (2023) and Keeping Children Safe in Education 2025, we have strong multi-agency working, including working with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of **early help** when additional needs of children are identified – for example, unexplained or persistent absences from education, multiple suspensions and being at risk of exclusion from education - and contributing to inter-agency plans which provide additional support for the child. We use the national multi-agency child protection standards from Working Together to Safeguard Children to ensure an unrelenting focus on protection and the best outcomes for children.

1.3.2 All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issues will receive appropriate support.

1.3.3 Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.

1.3.4 Identifying safeguarding and child protection concerns often begins with recognising changes in pupils' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour or difficulty in regulating behaviour may be an indicator of abuse.

1.3.5 All of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

2 Safeguarding legislation and guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2025)
- Working Together to Safeguard Children (2023)

- What to do if you're worried a child is being abused (2015)
- The Teachers' Standards 2012
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2024
- Early Years Foundation Stage Framework (EYFS)
- Ofsted Inspection Framework
- PACE Code C 2019
- DfE Data Protection guidance for schools (2025)

Schools and Nurseries providing for Early Years should also ensure procedures are in place that meet the Early years foundation stage (EYFS) statutory framework - GOV.UK

Children missing education: statutory guidance for local authorities and schools - GOV.UK

N.B. DS colleagues should ensure that old guidance is removed/destroyed as appropriate.

3 Roles and responsibilities

The Designated Safeguarding Lead (DSL) is:

Contact details: email: Tel:

The deputy DSL(s) is/are:

Contact details: email: Tel:

The Local Governing Committee (LGC member) for safeguarding is:

Contact details: email: Tel:

The headteacher is:

Contact details: email: Tel:

3.1 The Designated Safeguarding Lead (DSL):

3.1.1 The role of the Designated Safeguarding Lead (DSL) is outlined in Keeping Children Safe in Education (2025). The DSL takes lead responsibility for safeguarding and child protection (including online safety and safety outside the home) in the academy/trust. The DSL duties include:

- ensuring child protection policies are known, understood and used appropriately by staff;
- working with the board of trustees [and local governing committee] to ensure that the Trust's child protection policies are reviewed annually and that the procedures are reviewed regularly'
- acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters;
- acting as a point of liaison regarding ongoing enquiries under section 47 of the Children Act 1989, police investigations, and being aware of the requirement for Children to have an Appropriate Adult in relevant circumstances;
- acting as a point of contact with the three local safeguarding partners – i.e. the relevant local authority or authorities, police and Integrated Care Board (ICB);
- making and managing referrals to children's social care, the police, or other agencies;
- taking part in strategy discussions and inter-agency meetings;
- liaising with the assigned case manager and the designated officer(s) at the local authority if allegations are made against staff;
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements;
- transferring the child protection file to a child's new school within five days, using CPOMS to do so where possible;
- ensuring the relevant staffing ratios are met in Early Years settings and that each EYFS child is assigned a key person;
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities; and
- Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place and reporting concerns to the LGC member for safeguarding and Trust ICT Team. In line with Keeping Children Safe in Education 2025, the DSL's oversight of filtering and monitoring mechanisms includes ensuring the the effective filtering of generative AI images, and

proactively supporting online safety by educating pupils, staff and parents about misinformation, disinformation and conspiracy theories.

3.2 The Deputy Designated Safeguarding Lead(s):

3.2.1 Our Deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

3.3 The LGC member for safeguarding

3.3.1 The role of the this role-holder is to provide support and challenge to the DSL and the leadership of the school/trust on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. The role includes:

- understanding the requirements of the Governance Handbook and Keeping Children Safe in Education 2025;
- supporting and challenging the DSL on the standards of safeguarding at the school/trust;
- confirming that consistent good and compliant safeguarding practice takes place across the school/trust;
- working with the LGC to ensure all governors are trained in safeguarding in a timely manner and there is robust strategic challenge from the governing body as a whole to the school/trust; and
- reporting to the board of trustees about the standard of safeguarding in the school/trust.

3.4 The DSL and the LGC member for safeguarding will meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the school.

3.5 All staff are made aware of the definitions and indicators of abuse and neglect as identified by statutory guidance: Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2025). All staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.

4 Children who may be particularly vulnerable

4.1 Some children are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination and prejudice. To ensure that all of our pupils receive equal protection, we give special consideration to children who:

- are vulnerable because of protected characteristics identified under the Equality Act 2010, including race andethnicity, religion, disability, gender identity or sexuality;
- are vulnerable to being bullied, or becoming victims of child-on-child abuse, or who might engage in bullying or child-on-child abuse;
- are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism;

- live in chaotic or unsupportive home situations;
- have a mental health need;
- are a privately fostered child or in local authority care;
- have a parent in prison
- live transient lifestyles or live away from home or in temporary accommodation
- are affected by parental substance or alcohol abuse, domestic abuse or parental mental health needs
- are young carers, or who
- do not have English as a first language

5 Children with special educational needs and disabilities

5.1 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

5.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

6 Children who are absent from education

6.1 Children with unexplained or persistent absences from education and children missing from education can be an indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

6.2 We closely monitor attendance, absence and exclusions and our DSL will take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day where this becomes a pattern.

6.3 Where a child is absent, the school has a responsibility on the first date of absence to contact the parent or carer to locate the child. The school must refer to the local authority's reporting process for a child missing education and requirements on reasonable efforts to locate the child and assess safety, and should take the following steps:

6.4 discuss with the DSL and undertake a risk assessment on the vulnerability of the child;

- follow up phone calls and contact in writing (including email) with parents and emergency contacts if the child continues to be missing;

6.5 make a home visit and undertake a risk assessment; and

- advise the parent to contact the Police if they are unable to locate the child or are concerned about their safety;

6.6 All schools should notify the local authority of any pupil who has missed ten consecutive school days and where no explanation has been received and no contact with parent/carer, or sooner if the school has safety concerns.

6.7 Should a child go missing from school during the school day, the school will follow the Missing Child Protocol, alert all staff, carry out a sweep of the school and if the child is not found, contact the police.

6.8 Where possible, the school will hold more than one emergency contact number for each pupil, so there are additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern.

7 Mental health

7.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils.

7.2 All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences (ACEs) those experiences can impact on their mental health, behaviour and education.

7.3 Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy.

8 Children who are lesbian, gay, bisexual, trans or questioning their gender (LGBTQ+)

8.1 Informed by Keeping Children Safe in Education 2025the fact that a child or young person may be LGBTQ+ is not in itself an inherent risk factor for harm. Unfortunately, children who are or are perceived to be LGBTQ+can be targeted by other children. The risk to those children can be compounded where such children lack a trusted adult with whom they can be open.

8.2 Our staff endeavour to provide a safe space for those children to speak out or share their concerns with them.

9 Child-on-child abuse

9.1 Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is statistically more likely that boys will be perpetrators of child-on-child abuse and girls the victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

9.2 All staff should be clear about the school's policy and procedures for addressing child-on-child abuse and maintain an attitude of 'it could happen here'.

9.3 Child on child abuse can take many forms, including:

- **physical abuse** such as shaking, hitting, biting, kicking or hair pulling;

- **bullying,** including cyberbullying and the use of generative AI, prejudice-based and discriminatory bullying;
- **sexual violence and harassment** such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes;
- **causing someone to engage in sexual activity without consent,** such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- **upskirting**, which involves taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm;
- **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery**) including pressuring others to share sexual content;
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse;
- **initiation/hazing** – used to induct newcomers into sports team or school groups by subjecting them to intentionally dangerous, potentially humiliating or injurious trials for the purpose of initiation, participation, admission into or affiliation with any organisation or group.

9.4 Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

9.5 All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported. Staff will remain aware of changes to children's behaviour and will ensure they are given every opportunity to discuss any concerns.

Minimising risk

9.6 We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries;
- Using assemblies to outline acceptable and unacceptable behaviour, including online, when gaming and when using AI;
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs and other suitable activities; and
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable.

Investigating allegations of Child-on-child Abuse

9.7 All allegations of child-on-child abuse should be passed to the DSL immediately, who will investigate and manage the allegation as follows:

- **Gather information -** children and staff will be spoken with immediately to gather relevant information;
- **Decide on action -** if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy;
- **Inform parents -** we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil and so if the school believes that

notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted; and

- **Recording** – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on the school's child protection and safeguarding system (CPOMS). The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome. Body maps should be used where relevant to show the exact nature of the concern.

9.7.1 Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2025.

9.7.2 Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse:

Supporting those involved

9.8 Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

9.9 Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online harm can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

9.10 The support required for the pupil who has been harmed will depend on the particular circumstances and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work. Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.

10 Serious violence

10.1 All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

10.2 All staff are made aware through training and ongoing CPD of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery.

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

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

- Age
- Gender
- Sexual identity
- Cognitive ability
- Physical strength
- Perceived status
- Access to economic or other resources

11.2 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

11.3 Child Criminal Exploitation (CCE)

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

11.3.2 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

11.3.3 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

11.3.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

11.4 CCE Indicators

CCE indicators can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs or alcohol

- go missing for periods of time or regularly return home late
- regularly miss school or education or do not take part in education

11.5 Child Sexual Exploitation (CSE)

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

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

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

11.5.4 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

11.6 CSE Indicators

The CCE indicators above can also be indicators of CSE, as can children who:

- have relationships with older partners
- suffer sexually transmitted infections or become pregnant

11.7 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

11.8 Victims of criminal and sexual exploitation can be any gender, and it can have an adverse impact on a child's physical and emotional health.

11.9 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

12 County Lines

12.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

12.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out at paragraph 11.1 of this policy.

12.3 Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 11.4 of this policy, with the main indicator being missing episodes from home and/or school.

12.4 Additional specific indicators that may be present where a child is criminally exploited include children who:

- go missing and are subsequently found in areas away from home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line or online platforms, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation with which they have no connection or in a hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters; and
- have their bank accounts used to facilitate drug dealing.

12.5 All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

13 Sharing nudes and semi-nudes

13.1 Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18, including AI generated imagery created to resemble those under 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop.

13.2 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

13.3 The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer;
- children and young people digitally manipulate an image of a young person into an existing nude online; and
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

13.4 All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.

- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

13.5 The school will have regard to the advice from the UK Council for Internet Safety's advice on managing thr sharing if nudes and semi-nudes when managing these issues.

14 Online safety

14.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. In line with Keeping Children Safe in Education 2025 online safety considerations now includes the production of generative AI images and the production and distribution of misinformation, disinformation and conspiracy theories.

14.2 Our filtering and monitoring systems block harmful and inappropriate content and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least termly) to ensure their effectiveness, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils

14.3 We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe.

14.4 We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

14.5 Online safety risks can be categorised into four areas of risk:

- **Content**: being exposed to illegal, inappropriate or harmful content, including that created using AI, such as pornography, 'fake news', misogyny, self-harm, suicide, radicalisation and extremism;
- **Contact**: being subjected to harmful online interaction with other users such as peer-to-peer pressure and adults posing as children or young adults to groom or exploit children;
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images, and online bullying; and
- **Commerce**: risks such as online gambling, inappropriate advertising, phishing or financial scams.

14.6 All staff are aware of these risk areas and will report any concerns to the DSL. Further detail on our Trust approach to online safety is outlined in the Online Safety Policy available at: Bath and Wells Multi Academy Trust - Policies (bwmat.org)

15 Handheld devices and cameras

The Trust has a separate policy regarding the safe use of mobile devices [insert link to school policy]. This includes:

15.1.1 Personal devices are only to be used by staff when on a designated break away from the pupils. At all other times, personal devices are to be switched off.

15.1.2 Trust devices are only to be used by staff for work purposes. Photographs and videos of the pupils are only to be taken on school devices.

15.1.3 Images of the pupils will only be used in accordance with our Data Protection Policy available at: Bath and Wells Multi Academy Trust - Policies (bwmat.org)

16 Domestic abuse

16.1 The Domestic Abuse Act 2021 introduced a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

16.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.

16.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. Children who see, hear or experience its effects are victims of domestic abuse.

16.4 Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

16.5 In line with Operation Encompass, where police have been called to a domestic abuse incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child. In the event that the school becomes aware of a domestic abuse incident to which the police were called yet of which they were not made aware, the school will raise this as a concern with the police.

16.6 All staff are aware of the impact domestic abuse can have on a child. If any of our staff are concerned that a child has witnessed or heard domestic abuse, they will report their concerns immediately to the DSL.

17 'Honour-Based' abuse

17.1 So-called 'honour-based' abuse (HBA) encompasses actions taken to protect or 'defend the honour' of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.

17.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.

17.3 Preserving honour can also include carrying out, offering or aiding and abetting testing the virginity of a child or hymen repair (hymenoplasty). Our staff are aware of this possibility and the work in line with the Health and Care Act 2022 which deems such practice to be illegal. Any suspicions that such practice is about to be, or has been, carried out will be discussed with the DSL and reported to the police.

17.4 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they will speak to the designated safeguarding lead.

17.5 Female Genital Mutilation

17.5.1 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 and a form of child abuse with long-lasting harmful consequences.

17.5.2 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday, especially during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they believe that or discover that FGM has been carried out on a child under 18. In such circumstances, teachers may personally report the matter to the police as well as informing the designated safeguarding lead.

17.6 Forced Marriage

17.6.1 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. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse.

17.6.2 Forced marriage is illegal. It is also illegal to carry out any conduct where the purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

17.6.3 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

17.6.4 Forced marriage is not the same as arranged marriage, which is common in many cultures, and is characterised by the consent of both parties to marry.

17.6.5 If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

18 Radicalisation and Extremism

18.1 Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

18.2 Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

18.3 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead. Information and support about radicalisation and the PREVENT duty is available in partnership with the Home Office at https://actearly.uk/

18.4 If you are concerned and unsure where to go for advice, please contact The Essential Safeguarding Company via the following email addresses: emma@safeguardingco.co.uk or trudie@safeguardingco.co.uk

19 Children Missing Education

19.1 BWMAT recognises that children missing education (CME) may be at risk of harm and considers CME a safeguarding priority. The Trust is committed to early identification, robust monitoring, and appropriate escalation of concerns in line with statutory guidance.

19.2 CME is addressed within the safeguarding framework and linked to risks such as neglect, exploitation and radicalisation.

19.3 Attendance is monitored as part of safeguarding oversight, with patterns of absence reviewed by the Designated Safeguarding Lead (DSL).

19.4 The Trust ensures timely information sharing with local authorities, including notifications of unexplained absence, elective home education, and pupil movement.

19.5 National systems (E.g. GIAP, S2S) are used to support pupil tracking and continuity of education.

19.6 Transition points and vulnerable cohorts are given additional scrutiny to prevent disengagement from education.

19.7 Each school maintains multiple emergency contacts and ensures registers are updated in accordance with legal requirements.

19.8 This policy is underpinned by the principles of early help, multi-agency collaboration, and a whole school approach to safeguarding.

20 Staff/pupil relationships

20.1 Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18.

20.2 We provide our staff with advice regarding their personal online activity, and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules.

20.3 Our Staff Code of Conduct sets out our expectations of staff and is read, understood and signed by all staff members. It includes expectations regarding staff behaviour both face to face and virtually, via social media accounts, mobile phones and other electronic devices. Staff are also be expected to follow the school's policy on Mobile Devices.

21 Safeguarding concerns, including allegations and low level concerns about staff, supply staff, contractors and volunteers including governors and Trustees

21.1 If a safeguarding concern is raised or allegation made about a member of staff, supply staff, contractor or a volunteer, or relates to incidents that happened when an individual or organisation was using the school premises for the purposes of running activities for children, our set procedures must be followed. Our safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers procedure is available here: Bath and Wells Multi Academy Trust - Policies (bwmat.org), this also covers the reporting of low-level concerns. The full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2025.

21.2 The term 'low-level' concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. (

Examples of such behaviour could include, but are not limited to:

- Being over friendly or familiar with children;
- Having favourites;
- Taking photographs of children on their own mobile phone, or on a school devise without the written the consent of a parent;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- Using inappropriate sexualised, intimidating or offensive language.

21.3 Allegations made against staff who no longer work at the school will be reported to the local authority designated officer (LADO) or to the police.

21.4 In the situation that the school receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the DSL will follow the Trust safeguarding policies and procedures, including informing the LADO.

22 The Role of the LADO (Local Authority Designated Officer)

22.1 The LADO is responsible for:

- Providing advice, information, and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers;
- Managing and overseeing individual cases from all partner agencies;
- Ensuring the child's voice is heard and that they are safeguarded;
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made;
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible; and

- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and social care.

LADO Contact Details: [add as appropriate]

23 Whistle blowing if you have concerns about a colleague

23.1 It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the headteacher either directly if urgent or via CPOMS Staff Safe, unless the complaint is about the headteacher, in which case concern should be reported to the chair of the LGC.

23.2 Staff may also report their concerns directly to children's social care, the Local Authority Designated Officer (LADO), or the police if they believe direct reporting is necessary to secure action.

23.3 The school's Whistleblowing Policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place. The policy can be found at: Bath and Wells Multi Academy Trust - Policies (bwmat.org)

24 Staff training

24.1 Our staff receive appropriate safeguarding and child protection training(including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils. All training is accessed through Educare, Local Authorities and through attendance at Trust DSL training and networks.

24.2 New staff, governors and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff behaviour policy, how to report and record concerns and information about our Designated Safeguarding Lead and deputy DSLs.

24.3 Our LGC members/trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

24.4 Our LGC member for safeguarding/trustee receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high quality safeguarding across the trust.

25 Safer Recruitment

25.1.1 The governing body and our senior leadership team are responsible for ensuring we follow recruitment procedures that help to deter, reject or identify people who might harm children. When doing so we check and verify the applicant's identity, qualifications and work history in accordance with Keeping Children Safe in Education 2025, and the local safeguarding partner arrangements.

25.1.2 All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

25.1.3 We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and requests DBS checks where required by Keeping Children Safe in Education 2025. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

25.1.4 When using supply staff, we will obtain written confirmation from supply agencies or third party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

25.1.5 The school maintains a single central record of recruitment checks undertaken. Our recruitment policy and procedures can be accessed at: Bath and Wells Multi Academy Trust - Policies (bwmat.org)

26 Site security and collection of children

Visitors are asked to prove their identity to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times linked to a risk assessment. All visitors will be given guidance highlighting safeguarding arrangements on site.

The release of children from the school site will be only to those authorised (usually those with parental responsibility). Staff should refer to the Separated Parent Policy.

In the event of a parent/carer being delayed in collecting a child at the end of the day, they should telephone the school/nursery as soon as possible. In the event of a child not being collected after 15 minutes over time, staff will telephone the parent or carer and continue to telephone until a response is received. If there is no answer, staff will refer to the emergency contact numbers/details and, if possible, arrange for the child to be collected. After one hour, staff may be obliged to contact the local authority duty social worker. The child will be reassured and cared for during this time, supervised by two adults, all action taken will be recorded.

27 Child protection procedures

27.1 Recognising abuse

27.1.1 Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

27.1.2 Keeping Children Safe in Education 2025 refers to four categories of abuse, as well as explotation. These are set out at Appendix One along with indicators of abuse.

27.2 Taking action

Any child could become a victim of abuse. Key points for staff to remember for taking action are:

27.2.1 in an emergency take the action necessary to help the child, if necessary call 999;

27.2.2 complete a record of concern form, usually via CPOMS, and report your concern to the DSL as soon as possible – immediately, if urgent; and

27.2.3 share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family.

27.3 If you are concerned about a pupil's welfare

27.3.1 Staff may suspect that a pupil may be at risk. This may be because the pupil's behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.

27.3.2 If the pupil does reveal that they are being harmed, staff should follow the advice below.

27.3.3 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or might be being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

27.4 If a pupil discloses to you

If a pupil tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- remain calm and not overreact;
- allow them to speak freely;
- not be afraid of silences;
- not ask investigative questions;
- ask open questions such as: tell me, explain to me, describe to me (known as the 'TED technique');
- give reassuring nods or words of comfort – '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 automatically offer physical touch as comfort;
- let the pupil know that in order to help them they must pass the information on to the DSL immediately, or as soon as possible within the same day;
- tell the pupil what will happen next;
- complete the **concern form (or CPOMs log)** and pass it to the DSL as soon as possible; and
- report verbally to the DSL even if the child has promised to do it by themselves

27.5 Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents, unless to do so would place the child at an additional risk of harm. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

28 Referral to children's social care

The DSL 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 that a referral is being made, unless to do so would increase the risk to the child.

29 Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the head teacher or the chair of governors are not available and a referral is required immediately. Where a member of staff disagrees with the decision of a DSL and is concerned about their practice, the concern should be reported to the Chair of the LGC.

30 Confidentiality and sharing information

30.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead headteacher or chair of governors.

30.2 Sharing information

30.2.1 The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for deciding to do so.

30.2.2 Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

30.2.3 Information sharing decisions will be recorded, whether or not the decision is taken to share.

30.2.4 The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection Officer at One West.

30.2.5 When a child with a child protection file moves to a new school, the file will be shared confidentially with the new DSL, using CPOMS transfer where relevant and possible

30.3 Storing information

30.3.1 Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with our Retention and Destruction Policy.

30.3.2 Our Confidentiality and Information Sharing policy and our Retention and Destruction policy is available to parents and pupils on request.

31 Special Circumstances

31.1 Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL 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.

31.2 Children who have a social worker

31.2.1 Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decision about safeguarding and promoting the child's welfare.

31.2.2 Some overseas pupils may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable.

31.3 Private fostering arrangements

31.3.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for, or is expected to care 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 aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

31.3.2 Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will tell the DSL and the school will notify the local authority of the circumstances.

Appendix One - Four primary categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Physical abuse

Physical abuse is 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.

Indicators of physical abuse

The following may be indicators of physical abuse:

- Have bruises, bleeding, burns, bites, 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
- An injury that is not consistent with the account given
- Symptoms of drug or alcohol intoxication or poisoning
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond 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 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Inappropriate emotional responses, fantasies
- Self-harm
- Drug or solvent abuse

- Running away
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis (bed-wetting).

Sexual abuse

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

Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Aggressive behaviour including sexual harassment or molestation
- Reluctance to undress for PE or swimming
- Anal or vaginal discharge, soreness or scratching
- Bruises or scratches in the genital area
- Reluctance to go home
- Refusal to communicate
- Depression or withdrawal
- Isolation from peer group
- Eating disorders, for example anorexia nervosa and bulimia
- Self-harm
- Substance abuse
- Acquire gifts such as money or a mobile phone from new 'friends'

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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 and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate 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 neglect

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food
- Frequent tiredness
- Frequently dirty or unkempt
- Poor attendance or often late
- Poor concentration

- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones or to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is left at home alone or with inappropriate carers

Appendix Two - Related Safeguarding policies and Procedures

- Staff behaviour/code of conduct
- Physical intervention and the use of reasonable force (Positive Handling)
- Exclusions
- Personal and intimate care
- Complaints procedure
- Physical contact
- Safe working practice
- Whistleblowing
- SEND
- Missing children
- Recruitment and selection
- Safeguarding Concerns and Allegations Procedure
- Grievance and disciplinary
- Staff/pupil online communication
- Sexual exploitation
- Separated Parents
- Children with Medical Conditions
- Attendance
- Early Years
- Use of Mobile devices
- Online Safety
- Lettings