DMAT

Aspiration | Excellence | Transformation

DMAT Safeguarding and Child Protection Policy 2026-2027

(including Allegations Against Staff and Low-Level Concerns Policy)

Compiled/ Reviewed and Updated	**Author:** Pauline Montalto	**Date of last update:** Sep 2026
Approval By: DMAT Board of Trustees	**Date:** 24 September 2026	Review date: September 2027

KEY CONTACT DETAILS

IF A CHILD IS IN IMMEDIATE DANGER, CALL THE POLICE ON 999

Durrington High School

Safeguarding Roles and Local Contacts

Role / Information	School-specific details
School name	Durrington High School
Headteacher / Principal	Chris Woodcock and Shaun Allison
Designated Safeguarding Lead	Lindsey Tunbridge-Adams
Deputy Designated Safeguarding Lead(s)	Zoe Blackman (Deputy DSL) Large number of SLT are also DSL trained: Chris Woodcock (HT), John Fuller (DHT), Kim Fuller (AHT), Kate Blight (AHT & SENCO), Lianne Allison (DHT)
Local Governing Body Safeguarding Link	Jane Squires jsquires@durring.com
Local Authority Designated Officer	Miriam Williams, Donna Tomlinson and Victoria Williams **LADO.Admin@westsussex.gov.uk**
Children's Social Care referral route	Request support or raise a concern about a child - West Sussex County Council 01403 229900.
Out-of-hours safeguarding contact	Chris Woodcock cwoodcock@durring.com Shaun Allison sallison@durring.com Lindsey Tunbridge-Adams work mobile 07932 089176 John Fuller work mobile 07539 606098
Local safeguarding partnership procedures	Procedures - West Sussex SCP
School-specific contextual safeguarding risks	**Risk Area** / **Mitigation measures** **Online exploitation and coercion** / Continued online safety curriculum, CEOP signposting, filtering and monitoring through Securus, assemblies,

			safeguarding curriculum in P1, parental awareness sessions.
		Child-on-child harmful behaviour	Consistent behavioural expectations, relationship and sex education, early intervention by pastoral teams, robust recording on CPOMS, restorative work and parental engagement.
		Mental health,	House team support, DSL oversight, Mind the Gap provision, staff training, safety planning, external agency referrals and strengthening support for neurodivergent pupils, fast access to weekly MAMHET triage meetings
		Persistent absence among	Attendance interventions prioritise students with other vulnerable/risk factors. Targeted and direct DSL involvement alongside house teams. Consistent pastoral monitoring and direct work (via meetings and case reviews) with WSCC social care leads and WSCC attendance leads.
		Domestic abuse	Rapid information sharing and on-the-day response to Op Encompass notifications followed by pastoral check-ins, multi-agency working and targeted support for affected students.
		Parental Alcohol Misuse	Earlier identification through CPOMS safeguarding referrals, partnership with social care, attendance monitoring and direct support for affected young people.
		Neglect and financial hardship	Breakfast, uniform, welfare and tip access support, safeguarding monitoring & family support referrals.
		Radicalisation and extremist	Prevent training, staff awareness, monitoring, curriculum education and timely referrals (with robust follow up) to key partner agencies.
		Vulnerable students with social care involvement	Strong multi-agency working, transition planning, regular review meetings, governor oversight and safeguarding team capacity.
Alternative provision / off-site arrangements	Centralised leadership, tracking and checks on all AP providers used by AHT/HT		
Extended school / wraparound provision arrangements	None		

Laurels Primary School

Safeguarding Roles and Local Contacts

Role / Information	**School-specific details**
School name	The Laurels Primary School
Headteacher / Principal	Charlotte Bull
Designated Safeguarding Lead	Amy Elsden
Deputy Designated Safeguarding Lead(s)	Charlotte Bull. James Benham, Luke Alderton
Local Governing Body Safeguarding Link	Kerry Jones kjones@laurelsprimary.co.uk 01903 830901
Local Authority Designated Officer	Miriam Williams, Donna Tomlinson and Victoria Williams **LADO.Admin@westsussex.gov.uk**
Children's Social Care referral route	Request support or raise a concern about a child - West Sussex County Council 01403 229900.
Out-of-hours safeguarding contact	033 022 26664. 07711 769657

Local safeguarding partnership procedures	Procedures - West Sussex SCP
School-specific contextual safeguarding risks	Neglect Family breakdown Mitigations – Whole staff training. Local contexts highlighted in training. Cpoms used accurately and consistently. Building trusting relationships between pupils and staff. Using dedicated schools team effectively to address early concerns. Reporting concerns quickly and effectively to IFD. Regular check ins of vulnerable pupils. Bi weekly safeguarding meetings with SLT. Use of outside agencies e.g. NSPCC – Speak Out Stay safe. Work closely with families and build positive relationships.
Alternative provision / off-site arrangements	Half termly meetings with AP provider to check provision and safeguarding. Half termly visits to the child whilst they are attending their AP. Complete West Sussex AP form.
Extended school / wraparound provision arrangements	Premier wrap around club used.

Oak Tree Primary School

Safeguarding Roles and Local Contacts

Role / Information	School-specific details
School name	Oak Tree Primary
Headteacher / Principal	John Smith johnsmith@oaktreeprimary.co.uk
Designated Safeguarding Lead	Katy Woods sendco@oaktreeprimary.co.uk
Deputy Designated Safeguarding Lead(s)	John Smith Naomi Savage Joe Herbert
Local Governing Body Safeguarding Link	Eileen Sharpe
Local Authority Designated Officer	Miriam Williams, Donna Tomlinson and Victoria Williams LADO.Admin@westsussex.gov.uk
Children's Social Care referral route	Request support or raise a concern about a child - West Sussex County Council 01403 229900.
Out-of-hours safeguarding contact	033 022 26664. 07711 769657
Local safeguarding partnership procedures	Procedures - West Sussex SCP
School-specific contextual safeguarding risks	Domestic abuse / domestic violence Family breakdown Neglect Online behaviour outside of school

	Strategies in place: ● Whole staff training focused on school context ● CPOMs monitored and improved accuracy from staff ● DSL working closely with external agencies ● Operation Encompass renewed training ● DST and DSL working closely together to support families ● Effective and timely referrals to IFD ● Pastoral team working closely with vulnerable children - daily / weekly ● Weekly safeguarding meeting with the DSL team ● Links to local policing team ● Attendance at all external agency meetings
Alternative provision / off-site arrangements	No current provision in place - Katy Woods (DSL) to lead if necessary
Extended school / wraparound provision arrangements	JAG - Junior Adventure Group on site for breakfast and after school care.

Ringmer Primary and Nursery School

Safeguarding Roles and Local Contacts

Role / Information	School-specific details
School name	Ringmer Primary and Nursery School
Headteacher / Principal	Anna Crompton
Designated Safeguarding Lead	Sara Crane
Deputy Designated Safeguarding Lead(s)	Anna Crompton, Rebecca Rossi-Bennett, Anne Duc, Crystal Watson (EYFS DDSL)
Local Governing Body Safeguarding Link	Lizzie Maulkin
Local Authority Designated Officer	LADO: Allegations about adults who work with children | East Sussex County Council
Children's Social Care referral route	SPOA Contacting the Single Point of Access (SPoA) | East Sussex County Council 01323 464222
Out-of-hours safeguarding contact	01273 335906/01273 335905
Local safeguarding partnership procedures	Low Level Concerns/Early intervention Contact our family advice line | Family hubs 01323 46 46 55
School-specific contextual safeguarding risks	Anti-social behaviour in the local community - support from PCSO Ruth.ParnellMace@sussex.police.uk Road safety and open water safety (village pond) Units of work in preventative wellbeing curriculum. Building site safety due to new housing developments in the village. Assemblies, local community support from PCSO.
Alternative provision / off-site arrangements	Alternative Provision Lizzy Daly (SENCO)

	Off Site EVC Charlotte Hall
Extended school / wraparound provision arrangements	Sunrise (7.45am to 8.45am) and Sunset wrap around care (3.15pm to 5.30pm). Designated member of SLT on duty each day. DSL/DDSL on site during Wrap around care hours or contactable by phone.

Contents

KEY CONTACT DETAILS 2
Durrington High School 2
Laurels Primary School 4
Oak Tree Primary School 6
Ringmer Primary and Nursery School 8
1. Policy Statement 12
2. Scope and Purpose 12
3. Legislation and Statutory Guidance 13
4. Definitions 14
5. Key Safeguarding Roles 16
6. Equality Statement 16
7. Responsibilities 16
8. Confidentiality 21
9. Recognising Safeguarding Concerns 24
10. Children Who May Be at Greater Risk 25
11. Gender Questioning Children 26
12. Reporting and Responding to Concerns About a Child 26
13. Early Help, Family Help and Multi-Agency Working 28
14. Child-on-Child Abuse 29
15. Child-on- Parent/Carer Abuse 30
16. Violence against Women and Girls (VAWG) and Misogyny 30
17. Criminal and Sexual Exploitation 30
18. Online Safety, Filtering and Monitoring 31
19. Artificial Intelligence (AI) and Deepfake Risks 31
20. Safer Recruitment and Single Central Record 32
21. Allegations, Low Level Concerns and Whistleblowing 33
22. Visitors to DMAT Schools 33
23. Preventing Radicalisation 34
24. Trust Assurance, Local Information and Review 35
25. Policies linked to Safeguarding and Child Protection 36

Appendix 1:.....37
Types of Abuse.....37
Appendix 2:.....39
Specific Safeguarding Issues.....39
Appendix 3:.....51
Allegations Against Staff (including low-level concerns) Policy.....51
Low Level Concerns.....60

DMAT Safeguarding and Child Protection Policy

For all primary and secondary schools within the Trust, including schools with Early Years Foundation Stage provision: aligned with Keeping Children Safe in Education 2026 and effective from 1 September 2026. Local contacts for each school are included at the beginning of the policy.

1. Policy Statement

DMAT is committed to maintaining a strong safeguarding culture in which children are listened to, concerns are identified early, adults act professionally and decisively, and safeguarding is embedded within all aspects of Trust and school life.

This Trust-wide policy sets out the arrangements for safeguarding and promoting the welfare of children across all primary and secondary schools within the Trust, including schools with Early Years Foundation Stage provision. It reflects the statutory guidance Keeping Children Safe in Education 2026, which applies in England from 1 September 2026, and should be read alongside Working Together to Safeguard Children, the Statutory Framework for the Early Years Foundation Stage where applicable, local safeguarding partnership procedures, each school's local safeguarding arrangements, and the Trust's related policies.

Safeguarding is everyone's responsibility across the Trust. All staff, trustees, governors, members, volunteers, contractors, visitors and external providers must act in the best interests of the child, maintain a child-centred approach, and respond promptly to any concern that a child may be at risk of harm.

Within this policy, reference to the headteacher also includes co-headteachers. Reference to a designated safeguarding lead (DSL) also includes deputy DSLs.

2. Scope and Purpose

This policy applies to all adults working in or on behalf of the Trust and its schools, including permanent, temporary and supply staff, volunteers, trustees, local governors, members, contractors, trainee teachers, visitors, external providers and central Trust staff. It covers all children on roll at Trust schools, including children in Early Years Foundation Stage provision where applicable, applicants, children attending alternative provision, children on educational visits or work experience, children accessing extended school provision, and any child with whom Trust staff come into contact in the course of their duties.

The purpose of this policy is to ensure a consistent safeguarding framework across the Trust while allowing each primary and secondary school, including schools with EYFS provision, to maintain local procedures, contacts and contextual risk assessments. It ensures concerns are identified early, children receive timely help and protection, staff understand their responsibilities, and Trust and school leaders maintain effective safeguarding systems, including safer recruitment, training, information sharing, monitoring, assurance and robust oversight.

3. Legislation and Statutory Guidance

This policy is based on, and should be read alongside, relevant legislation, statutory guidance and non-statutory guidance relating to safeguarding and child protection in England. The Trust will review this policy whenever relevant law, statutory guidance, or local safeguarding partnership procedures are updated.

The principal statutory guidance informing this policy is Keeping Children Safe in Education 2026, which sets out the legal duties schools and colleges must follow to safeguard and promote the welfare of children and young people under the age of 18, and Working Together to Safeguard Children 2026, which sets out multi-agency arrangements to help, support, protect and promote the welfare of children. For schools with Early Years Foundation Stage provision, this policy also reflects the Statutory Framework for the Early Years Foundation Stage for group and school-based providers, including its safeguarding and welfare requirements. Until 31 August 2026, schools must continue to apply Keeping Children Safe in Education 2025 where relevant.

This policy also reflects the following legislation and guidance, as applicable to schools, academy trusts and education settings:

- Children Act 1989 and Children Act 2004, including duties relating to children in need, child protection enquiries and co-operation between agencies.
- Education Act 2002, particularly section 175, which places duties on schools and local authorities to safeguard and promote the welfare of children.
- Statutory Framework for the Early Years Foundation Stage, where applicable to Trust schools with early years provision, including safeguarding and welfare requirements, staff suitability, child absences, ratios, health, behaviour, records, policies and procedures.
- Education and Inspections Act 2006, including duties relating to pupil safety and behaviour.
- Equality Act 2010, including the Public Sector Equality Duty and duties to make reasonable adjustments for disabled children and staff.
- Human Rights Act 1998, including the rights of children, parents, carers and staff to be treated lawfully, fairly and proportionately.
- Data Protection Act 2018 and UK GDPR, including lawful, proportionate and timely information sharing for safeguarding purposes.

- Counter-Terrorism and Security Act 2015, including the Prevent duty.
- Serious Crime Act 2015, including provisions relating to female genital mutilation and mandatory reporting duties.
- Modern Slavery Act 2015, including duties and indicators relating to trafficking, exploitation and modern slavery.
- Domestic Abuse Act 2021, including the recognition of children as victims of domestic abuse where they see, hear or experience its effects.
- Sexual Offences Act 2003 and Voyeurism (Offences) Act 2019, where relevant to safeguarding, harmful sexual behaviour, sexual violence, sexual harassment and image-based abuse.
- Protection of Freedoms Act 2012, Safeguarding Vulnerable Groups Act 2006 and related safer recruitment and barred list requirements.
- Teacher misconduct, prohibition and safer recruitment guidance, including requirements relating to DBS checks, prohibition checks, section 128 checks where relevant, and the single central record.
- Information sharing advice for safeguarding practitioners and relevant local safeguarding partnership procedures.
- Searching, screening and confiscation guidance, behaviour guidance, suspension and permanent exclusion guidance, attendance guidance, alternative provision guidance and other relevant Department for Education guidance.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- Information Sharing Duty Statutory Guidance for Safeguarding Organisations and their Practitioners (Department for Education, September 2026)

4. Definitions

A child is anyone under the age of 18.

For the purposes of this policy, **safeguarding** and promoting the welfare of children means protecting children from maltreatment, preventing impairment of children's mental and physical health or development, ensuring children grow up in circumstances consistent with safe and effective care, and taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and refers to activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing the ill treatment of others, including domestic abuse. Children may be abused in a family, institutional or community setting, by those known to them or by others, including online. Abuse may be carried out by adults or by other children.

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

Sharing nudes and semi-nudes means sending, posting or otherwise sharing nude or semi-nude images, videos or live streams by, or of, children and young people online or using digital technology. This includes consensual and non-consensual sharing, pressured or coerced sharing, receiving or possessing such images, onward sharing, and incidents involving image editing, artificial intelligence or other technology. All incidents must be treated as safeguarding concerns and handled in line with statutory guidance, UKCIS advice and school procedures.

Victim means a child who has reportedly experienced harm, abuse, neglect, exploitation, harassment, sexual violence, sexual harassment or another safeguarding concern. The term should be used sensitively and should not imply that the child's account has been predetermined; schools should also use the language preferred by the child where appropriate.

Alleged perpetrator means a child or adult who is reported to have caused harm, abuse, neglect, exploitation, harassment, sexual violence, sexual harassment or another safeguarding concern. The term should be used in a neutral and non-judgemental way while concerns are assessed, investigated or managed, and schools must ensure that all children involved are safeguarded and supported.

Safeguarding partners are the local authority, an Integrated Care Board for an area within the local authority area, and the chief officer of police for an area within the local authority area. They are responsible for making arrangements to work together, and with relevant agencies, to safeguard and promote the welfare of children in their area.

Local Authority means the council with statutory responsibility for children's services in the relevant area, including duties relating to children in need, child protection enquiries, looked after children, local safeguarding arrangements and support for children and families.

Integrated Care Board means the NHS body responsible for planning and arranging health services for the local population and for working with safeguarding partners to support arrangements to safeguard and promote the welfare of children.

Chief Officer of Police means the senior police officer responsible for policing in the relevant area and for working with safeguarding partners to support multi-agency arrangements to safeguard and promote the welfare of children.

5. Key Safeguarding Roles

Each DMAT school must maintain its own local safeguarding contacts list setting out named safeguarding personnel, local authority contacts, referral routes and school-specific safeguarding arrangements. These are included at the beginning of this policy and must be reviewed and updated locally whenever personnel, contact details or procedures change.

6. Equality Statement

DMAT is committed to providing safe, inclusive and respectful environments in which all children are valued and protected from harm. We recognise that some children may be at greater risk of abuse, neglect or exploitation and that additional barriers can exist which may prevent them from recognising, reporting or disclosing safeguarding concerns.

In accordance with Keeping Children Safe in Education 2026, we are committed to anti-discriminatory safeguarding practice and will ensure that all safeguarding decisions are made in the best interests of the child, free from discrimination or bias. We acknowledge that children may face vulnerabilities relating to their age, disability, special educational needs, health needs, race, ethnicity, religion or belief, sex, socio-economic circumstances, family background, sexual orientation, gender identity, pregnancy or maternity, or any other protected characteristic.

Staff will be vigilant to the specific safeguarding needs of individual children and will take account of their lived experiences, communication needs and personal circumstances when identifying concerns, assessing risk and providing support. We will ensure that all children have equal access to protection, support and intervention, and that safeguarding arrangements promote dignity, respect, inclusion and equality of opportunity for every child.

7. Responsibilities

Safeguarding and child protection are **everyone's** responsibility. This policy applies to all staff, volunteers and governors in DMAT and its schools and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities. The DMAT Safeguarding Lead provides strategic oversight, quality assurance, professional support, and escalation across the Trust.

All staff across DMAT must:

- Read and understand Part One of Keeping Children Safe in Education 2026 Keeping Children Safe in Education. This is in accordance with KCSIE 2026. Annex A has been withdrawn
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance

- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL and DDSLs) , the school's Behaviour Policy, DMAT Information and Technology (ICT) and Acceptable Use Policy and the safeguarding response to children who go missing from education/who are absent from education.
- role in including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children

- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Trust schools play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Each school's Behaviour Policy
- Pastoral support system
- Planned programme of age-appropriate relationships educations and relationships, sex and health education, which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

The DMAT Board of Trustees is responsible for ensuring that effective safeguarding policies, procedures, training, monitoring and assurance arrangements are in place across all Trust schools. It must ensure safer recruitment duties are met, safeguarding is embedded across the curriculum and wider culture, and appropriate oversight, support and challenge are provided through Trust governance and local governance arrangements. The Trust Board will evaluate and approve this policy at each review and appoint a link trustee for safeguarding.

Each school's **Local Committee** of governors will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor for safeguarding to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL

- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and reviews their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
    - Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
    - DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - Ensure the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members, including supply staff, volunteers and contractors. (Allegations Against Staff and Low-Level Concerns Policy Appendix 3)
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
    - Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (appendix3).

Headteachers are responsible for implementing this policy within their schools, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
    - Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources
- Ensuring that there are robust measures in place to cover the DSL during any absence or out of hours/ out of school activities, including coverage of the DSL mailbox.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- In primary schools and EYFS settings, ensuring the relevant staffing ratios are met, where applicable
- In Early Years settings, making sure:
    - Each child in the Early Years Foundation Stage is assigned a key person
    - Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

Each school's **Designated Safeguarding Lead** (DSL) has lead responsibility for safeguarding and child protection in that school, including referrals, liaison with safeguarding partners, support for staff, oversight of child protection records, staff training, information sharing, and raising awareness of safeguarding procedures, review and checks of monitoring and filtering processes. The DSL will:

- Provide advice and support to other staff on child welfare and child protection matters

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to relevant bodies e.g. Local Authority, Children's Social Care, Channel programme, Disclosure and Barring Service (DBS) and police, and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in their school
- Ensure staff have appropriate Prevent training and induction
- Act as lead practitioner for the Local Authority
- Keep the headteacher informed of any issues
- Be aware that children must have an appropriate adult to support and help them in the case of a police investigation
- Be confident that the know what local specialist support is available to support all children, including victims and alleged perpetrators involved in sexual violence and harassment and be confident as to how to access the support
- Liaise with Local Authority case managers and designated officers for child protection concerns, as appropriate

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

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

They should also identify and engage with key professionals, e.g. DSLs, Special Educational Needs Co-ordinators (SENCOs), social workers, mental health leads and others

8. Confidentiality

DMAT is committed to protecting the privacy and confidentiality of children, young people, and their families. Information relating to safeguarding concerns will be handled sensitively and shared only on a need-to-know basis, in accordance with relevant legislation, statutory guidance, and data protection requirements. The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Information Sharing

The Trust recognises that effective safeguarding depends upon the timely, lawful and proportionate sharing of information. All staff must understand that concerns about data protection, confidentiality or obtaining consent must never prevent them from sharing information where doing so is necessary to safeguard or promote the welfare of a child. Decisions about information sharing will always be child-centred, proportionate and focused

on the best interests of the child. Staff should seek advice from the Designated Safeguarding Lead (DSL) where necessary, but should not delay the sharing of safeguarding information if a child may be at risk of harm.

The Trust will ensure that information is shared securely, accurately, on a need-to-know basis and in accordance with statutory safeguarding requirements. Information sharing to safeguard children and young people and Information Sharing Duty Statutory Guidance for Safeguarding Organisations and their Practitioners (September 2026) emphasise that effective information sharing is essential to protecting children and promoting their welfare. Where the statutory information sharing duty applies, schools **must** share information with another organisation or requestor if it may help assess needs, make decisions, or provide support.

The Trust will comply with the requirements of the Information Sharing Duty introduced through section 16LA of the Children Act 2004 and the accompanying statutory guidance. Staff should understand that, where relevant information may help safeguard or promote the welfare of a child, there is a clear expectation that organisations and practitioners will share that information appropriately. Decisions should be informed by professional judgement, local safeguarding arrangements and the needs of the child, while ensuring that information is processed lawfully and responsibly. The Trust will challenge any culture or practice that creates unnecessary barriers to the sharing of safeguarding information.

When making decisions about sharing information, staff should have regard to the Seven Golden Rules for Information Sharing:

1. **Data protection is not a barrier to sharing information**
2. **Be open and honest**
    - Explain to individuals (and/or their families where appropriate) what information may be shared, with whom, and why, unless doing so would increase risk or prejudice an investigation
3. **Seek advice if you are unsure**
    - Consult your Designated Safeguarding Lead (DSL, or another appropriate professional if you are uncertain about sharing information.
4. **Where possible, share with consent**
    - Seek consent **when appropriate**. Where the terms of the information sharing duty are met, confidential information can be shared without obtaining consent. Any discussion with parents or children should avoid implying that their agreement is what determines whether information is shared, and practitioners should avoid seeking consent if they intend to share information in any case. as this is false choice.
5. **Consider safety and wellbeing**

- Base your decision on the safety and welfare of the child or vulnerable person. Ask yourself: *What might happen if I do not share this information?*

6. **Share information that is necessary, proportionate, relevant, accurate, timely and secure**
7. **Keep a record**
    - Record your decision, what was shared, with whom, when it was shared, and the reasons for your decision, whether you shared the information or not.

In particular, staff should remember that data protection legislation is not a barrier to safeguarding; information should be shared where it is necessary, proportionate, relevant, adequate, accurate, timely and secure; and all decisions to share or not share information should be appropriately recorded. These principles support the statutory information-sharing framework and help ensure that children receive the right support at the right time.

Recording and Accountability

The Trust expects all safeguarding decisions relating to information sharing to be clearly documented. Records should identify what information was shared, with whom, for what purpose, under what legal basis, and the rationale for any decision not to share information. Accurate record keeping supports accountability, multi-agency working and effective safeguarding practice, and provides evidence that decisions have been made in the best interests of the child.

If staff are in any doubt about information sharing, they should speak to the DSL.

Confidential information may be shared without consent where there is a lawful basis to do so, particularly when a child is at risk of harm, abuse, neglect, exploitation, or where sharing information is necessary to safeguard and promote the welfare of a child. In such circumstances, the safety and wellbeing of the child will always take precedence over confidentiality.

Timely information sharing is essential to effective safeguarding. All staff, volunteers, and governors must ensure that information is recorded accurately, stored securely, and only shared with appropriate professionals and agencies who have a legitimate safeguarding need. Decisions to share information should be proportionate, necessary, and documented, including the reasons for sharing or not sharing information.

DMAT recognises that effective information sharing is essential for early intervention and safeguarding and will work collaboratively with parents, carers, external agencies, and statutory partners where appropriate to protect children and young people from harm.

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests. The DSL will have to balance the victim's wishes

against their duty to protect the victim and other children. The DSL should consider that parents or carers should normally be informed, unless this would put the victim at greater risk.

If a victim asks the school not to tell anyone about sexual violence or sexual harassment, staff may still lawfully share information if there is another legal basis under UK GDPR that applies. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system. Staff will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved. The potential impact of social media in facilitating the spreading of rumours and exposing victims' identities needs to be considered.

The basic safeguarding principle is:

if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff (appendix 3).

9. Recognising Safeguarding Concerns

Staff across all Trust schools must remain alert to indicators of abuse, neglect and exploitation, recognising that children may not always disclose directly and that concerns may arise from changes in behaviour, appearance, attendance, attainment, relationships, mental health, online activity, communication, play, care routines or information shared by others. Indicators may present differently in early years, primary and secondary settings and must be considered in light of the child's age, development, communication needs and lived experience.

- Physical abuse, including hitting, shaking, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm.
- Emotional abuse, including persistent emotional maltreatment, humiliation, intimidation, exposure to domestic abuse, or inappropriate expectations.

- Sexual abuse, including forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening.
- Neglect, including persistent failure to meet a child's basic physical or psychological needs.
- Exploitation, including child sexual exploitation, child criminal exploitation, county lines, serious violence, radicalisation, modern slavery and online exploitation. These may be linked and happening simultaneously.

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

10. Children Who May Be at Greater Risk

We pay particular attention to:

- Babies and young children in early years provision
- Children with special educational needs or disabilities
- Children with health conditions including suffering from mental ill heath
- Children who are bereaved
- Children absent from education/ missing education/ persistently or severely absent
- Children in care or previously in care/ returned home to their family from care
- Privately fostered children
- Young carers
- Children affected by domestic abuse
- Children affected by child to parent /carer abuse
- Children at risk of criminal exploitation or sexual exploitation
- Children at risk of being radicalised or exploited
- Children viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Children in a family circumstance presenting challenges such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Children misusing drugs or alcohol
- Children at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Children who have a parent or carer in custody or is affected by parental offending
- Children who have experienced multiple suspensions and is at risk of, or has been permanently excluded
- Children who are questioning their gender
- Children with a social worker
- Children facing barriers to communication or disclosure

- Children affected by early childhood vulnerability in EYFS and primary settings
- Children affected by adolescent risk, peer influence or contextual safeguarding risks in secondary settings
- Pregnant pupils and teenage mothers
- Children displaying early signs of abusive or harmful behaviour

Staff, volunteers, and governors must never assume that another professional will take action. Where a child may need additional support, staff should discuss concerns with the designated safeguarding lead.

11. Gender Questioning Children

DMAT recognises that children who are gender questioning may experience bullying, discrimination, isolation, family conflict, mental health difficulties and online harms. Staff will consider each child individually, work in partnership with parents/carers where appropriate, and ensure safeguarding decisions are child-centred, evidence-informed and in the child's best interests. Any support provided will be proportionate to need and in line with statutory guidance.

12. Reporting and Responding to Concerns About a Child

Any concern about a child must be reported to the school's designated safeguarding.

If a child is suffering or likely to suffer harm, or at immediate risk of harm in immediate danger staff must take urgent action by contacting children's social care and/or the police and then inform the designated safeguarding lead as soon as possible. Where a concern crosses school, phase, local authority or Trust boundaries, the DSL must liaise with the Trust Safeguarding Lead and relevant agencies without delaying protective action. Anyone can make a referral.

If a child makes a disclosure/shares a concern, the adult should:

- Listen to and believe them. Allow them time to talk freely and not ask leading questions.
- Not promise confidentiality but explain that information may need to be shared to keep them safe.
- Stay calm and not show shock or upset
- Tell the child they have done the right thing in sharing the information and not tell them they should have shared the information sooner
- Explain what will happen next
- Write up the conversation as soon as possible, in the child's own words, sticking to the facts, and not adding own judgement. The account should include time, location, context of interaction and actions taken then signed and dated and passed on to the DSL.

- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, the information should not be shared with anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should hinder 'professional curiosity' and speaking to the DSL if there are concerns about a child.

In EYFS settings we will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

If there is concern that female genital mutilation (FGM) has taken place or a pupil is at risk of FGM, Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who either:

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

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils. (see appendix 2)

If there is concern about a child regarding extremism but the child is not suffering or likely to suffer from harm, or in immediate danger, where possible, the DSL should be alerted first to agree on a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. The headteacher should be alerted and/or advice sought from local authority children's social care. The DSL should be informed as soon as practically possible after the referral.

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

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. The email address: counter.extremism@education.gov.uk can be used but is not for emergency situations.

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

If there is a concern about mental health, it will be shared promptly with the Designated Safeguarding Lead (DSL), who will assess the level of need, coordinate support, consider referrals to appropriate services, and work in partnership with parents/carers and external agencies where it is safe and appropriate to do so.

DMAT Schools recognises that positive mental health is fundamental to a child's wellbeing, safety, learning and development. In line with *Keeping Children Safe in Education (KCSIE) 2026*, all staff understand that mental health concerns can be an indicator that a child has suffered, or may be at risk of suffering, abuse, neglect, exploitation or other forms of harm, and should never be viewed in isolation.

DMAT schools are committed to creating supportive, inclusive environments that promote resilience, early intervention and access to timely mental health support, ensuring that safeguarding remains at the centre of all decision-making.

Staff will be given training to understand how adverse experiences, like abuse and neglect, can have a lasting impact on a child's mental health, behaviour and education. Whilst only professionals should diagnose mental health problems, staff are well placed to identify, record, and appropriately respond to signs of emotional distress, significant changes in behaviour, self-harm, suicidal ideation, eating difficulties, social withdrawal or other indicators of concern. These behaviours may indicate a child is experiencing mental health problems or at risk of developing them.

13. Early Help, Family Help and Multi-Agency Working

DMAT schools are committed to working in partnership with children, families and other agencies to promote the welfare of children and ensure that they receive the right support at the right time. In line with Keeping Children Safe in Education 2026 and the national reforms introduced through the **Families First Partnership Programme**, DMAT schools recognise the importance of providing timely help and support for children and families as soon as concerns emerge.

This may include school-led support, pastoral intervention, early years support, community-based early help, Family Help through the local authority, or referral to children's social care

where statutory intervention may be required. Schools will ensure that support is age-appropriate and accessible to children in EYFS, primary and secondary phases.

Staff will work collaboratively with safeguarding partners and other relevant agencies to identify needs early, contribute to assessments, and support the delivery of appropriate Family Help and child protection arrangements. Where concerns about a child's welfare are identified, schools will take prompt action, share information appropriately, and engage with local multi-agency processes to ensure that children and families receive effective support and protection. All safeguarding practice will remain child-centred, with the best interests of the child at the heart of decision-making

The Trust Safeguarding Lead may support escalation, cross-school learning and quality assurance where appropriate.

14. Child-on-Child Abuse

DMAT recognises that children can abuse other children and that child-on-child abuse can occur both inside and outside of school, including online. This may include bullying, cyberbullying, physical abuse, sexual violence, sexual harassment, consensual or non-consensual sharing of nude or semi-nude images or videos, initiation or hazing-type violence, exploitation, coercive control, abuse in intimate personal relationships, harmful sexual behaviour and abuse linked to misogyny or prejudice.

DMAT schools recognise that children who display harmful behaviour may themselves have experienced trauma, abuse, neglect, or exploitation. Safeguarding assessments will therefore consider the needs of both the child who has allegedly experienced harm and the child who has allegedly caused harm, with appropriate support provided to each.

DMAT schools will respond in an age-appropriate and developmentally appropriate way and recognise that behaviours may present differently across early years, primary and secondary settings.

The Trust adopts a zero-tolerance approach to child-on-child abuse across all schools and a culture of vigilance in which concerns are never dismissed as “banter”, “part of growing up” or “just having a laugh”. This does not mean that all incidents will result in the same sanction; it means that all concerns will be taken seriously, recorded, risk assessed and responded to in a way that protects and supports all children involved, with consideration of their age, understanding, additional needs and wider context.

Allegations and concerns will be managed in accordance with Keeping Children Safe in Education 2026, local safeguarding partnership procedures and the Trust/ school’s behaviour, safeguarding and child protection procedures.

15. Child-on- Parent/Carer Abuse

Child-to-Parent/Carer Abuse

DMAT recognises that abuse can sometimes be directed by a child towards a parent, carer or other family member. Child-to-parent/carer abuse may involve physical violence, threats, intimidation, verbal abuse, coercive or controlling behaviour, emotional abuse, damage to property, or behaviour that causes fear and distress within the family.

In line with Keeping Children Safe in Education 2026, staff will be alert to indicators that a child may be displaying harmful or abusive behaviour towards those caring for them and will consider this within the wider safeguarding context. Concerns will be responded to sensitively and proportionately, recognising that the child may also have unmet needs, have experienced trauma, abuse or adverse childhood experiences. Such concerns will be recorded, assessed and referred to appropriate services where necessary, with support provided to both the child and affected family members in accordance with local safeguarding partnership procedures.

16. Violence against Women and Girls (VAWG) and Misogyny

DMAT recognises that misogyny and violence against women and girls are safeguarding issues that can contribute to harmful attitudes, sexual harassment, sexual violence, online abuse, coercive and controlling behaviour, and other forms of gender-based harm, and that schools have an important role in preventing, identifying and responding. DMAT will foster a culture of respect, inclusion and zero tolerance of abuse, harassment and discrimination.

Through a whole-school approaches to safeguarding, behaviour, relationships education and pastoral support, staff will actively promote equality, respect and healthy relationships, whilst remaining vigilant to attitudes and behaviours that may indicate a child is at risk of harming others or being harmed, and responding promptly to concerns. DMAT is committed to creating a culture in which all children feel safe, valued and able to report concerns, and where harmful attitudes towards women and girls are challenged effectively and consistently.

Safeguarding responses will be child-centred, proportionate and conducted in accordance with statutory guidance and local safeguarding partnership procedures.

17. Criminal and Sexual Exploitation

Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and modern slavery are forms of child abuse that can be closely linked and may occur simultaneously.

In line with Keeping Children Safe in Education 2026, staff will be alert to the fact that children who are exploited may be subjected to coercion, control, manipulation, deception or violence and may appear to be participating willingly in harmful activities. DMAT acknowledges that criminal exploitation, sexual exploitation, county lines activity, trafficking and modern slavery

can involve children being exploited by individuals or groups for financial gain, sexual purposes or criminal activity.

Staff will remain vigilant to the indicators of exploitation, recognising that victims may not identify themselves as such and may be reluctant or unable to disclose abuse. Where concerns arise, schools will take immediate safeguarding action, make appropriate referrals, and where relevant consider referrals through the National Referral Mechanism (NRM) in accordance with statutory guidance and local safeguarding partnership procedures. All concerns will be managed using a child-centred approach that prioritises the safety, welfare and best interests of the child.

18. Online Safety, Filtering and Monitoring

Online Safety, Filtering, Monitoring and the Use of Mobile Phones and Personal Devices

DMAT recognises that technology presents both opportunities and risks for children and that safeguarding concerns can arise online as well as offline. In accordance with Keeping Children Safe in Education 2026, schools have appropriate filtering and monitoring systems in place to help safeguard pupils from harmful, inappropriate or illegal content and activity when using school networks, systems and devices.

The effectiveness of filtering and monitoring arrangements will be reviewed, recorded and reported at least annually, and whenever there is a significant change in technology, safeguarding risk or school provision. Schools will also review responsibilities, reporting routes, technical provision, staff training and the needs of children who may be more vulnerable to online harm. Concerns about artificial intelligence, information security, access management, cybercrime or harmful online content must be reported through local safeguarding and IT reporting procedures.

DMAT schools also have clear expectations regarding the safe and responsible use of mobile phones, personal devices and emerging technologies by pupils, staff and visitors. Each school has its own policy detailing this, linked to the school context and in line with Mobile Phones in Schools (statutory guidance 2026).

Staff will remain vigilant to online safeguarding risks including cyberbullying, online grooming, exploitation, radicalisation, sexual abuse, the sharing of nude or semi-nude images, AI-generated and deepfake content, and other forms of harmful online behaviour.

Through a broad and balanced curriculum, pupils will be taught age/development appropriately content for EYFS, primary and secondary pupils, on how to use technology safely, responsibly and respectfully and how to seek help if they encounter concerns online.

19. Artificial Intelligence (AI) and Deepfake Risks

DMAT recognises that advances in artificial intelligence (AI) and generative technologies present emerging safeguarding risks for children and young people. In line with Keeping

Children Safe in Education 2026, staff will be alert to the potential misuse of AI, including the creation, sharing or manipulation of images, audio and video content, commonly referred to as 'deepfakes', which may be used to facilitate bullying, harassment, sexual abuse, exploitation, coercion, humiliation or other forms of harm.

DMAT acknowledges that AI-generated content can be difficult to identify and may have a significant impact on a child's welfare, wellbeing and safety. Through its age-appropriate curriculum content regarding online safety, filtering and monitoring arrangements, staff training and safeguarding procedures, schools will educate pupils about the risks associated with AI technologies, promote responsible and ethical use, and respond promptly to concerns involving AI-generated or manipulated content.

Any safeguarding concern involving artificial intelligence, deepfake content or related technologies will be recorded, risk assessed and managed in accordance with this policy, KCSIE 2026 and local safeguarding partnership procedures.

20. Safer Recruitment and Single Central Record

DMAT has a separate DMAT Safer Recruitment Policy and follows robust safer recruitment procedures to deter, identify and reject people who may pose a risk to children.

DMAT is committed to safeguarding and promoting the well-being of all children and expects all staff, volunteers, trustees, governors and contractors to share this commitment. Recruitment panels will include at least one person trained in safer recruitment, and all required pre-appointment checks will be completed before employment begins unless a risk-assessed exception is permitted by law and guidance. Recruitment processes will include consideration of any gaps in employment, concerns arising from references, and the candidate's suitability to work with children. These procedures apply to school-based and central Trust roles.

Any concerns arising during the recruitment process, employment, agency engagement or voluntary work will be managed in accordance with statutory guidance and DMAT's safeguarding procedures. The Trust recognises that safeguarding responsibilities continue beyond appointment and will ensure that all staff receive appropriate induction, safeguarding training, supervision and ongoing monitoring to maintain a safe culture for children

DMAT will consider carrying out an online search as part of its due diligence on shortlisted candidates to help identify any incidents or issues that may be relevant to their suitability to work with children. Any information obtained will be considered fairly and proportionately and in accordance with data protection requirements.

From 1 September 2026, the definition of regulated activity has changed following the removal of the supervision exemption under the Crime and Policing Act 2026. As a result, certain volunteers who previously fell outside regulated activity because they were supervised may now be considered to be undertaking regulated activity if their work with children is carried out frequently or meets the relevant period conditions. Where an individual is undertaking

regulated activity, DMAT schools will obtain an enhanced DBS certificate with children's barred list information before they commence their role.

The main group affected by the 1 September 2026 change are volunteers who work directly with children and were previously excluded from regulated activity because they were supervised by a member of staff who was in regulated activity.

The guidance states that activities such as **teaching, training, instructing, caring for or supervising children** are now regulated activity if they are carried out:

- Frequently or
- On more than three days in a 30-day period or
- Overnight

DMAT recognises the changes to regulated activity introduced from 1 September 2026 following the removal of the supervision exemption. The Trust will assess all volunteer roles to determine whether they constitute regulated activity and, where required, will obtain an enhanced DBS certificate including children's barred list information before the individual commences their duties. The Trust will ensure that no individual who is barred from working with children is permitted to engage in regulated activity and will regularly review recruitment, vetting and volunteer arrangements to ensure compliance with statutory safeguarding requirements.

The single central record (SCR) will be maintained accurately for each DMAT school and the DMAT central team and reviewed regularly through school and Trust assurance processes. The SCR will record required checks for staff, supply staff, trainee teachers, volunteers, governors, trustees, members and others as applicable, including identity, barred list, enhanced DBS, prohibition from teaching, section 128 where relevant, right to work, qualifications and overseas checks where required.

Further information can be found in the DMAT Whistleblowing Policy

21. Allegations, Low Level Concerns and Whistleblowing

Please see the Allegations Against Staff and Low Level Concerns Policy (Appendix 5) or DMAT Whistleblowing Policy, as appropriate.

22. Visitors to DMAT Schools

The DMAT Visitor Policy sets out expectations and protocols for visitors to the school and Trust. All visitors will be required to verify their identity to the satisfaction of staff and to follow the policy. This includes those who are visiting the school in a professional capacity.

23. Preventing Radicalisation

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

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

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

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

Schools will ensure that suitable internet filtering is in place and equip pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy

- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join extremist organisations

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

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

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

24. Trust Assurance, Local Information and Review

Each school will maintain a local safeguarding contact list that includes named safeguarding personnel, local authority contacts, and will implement and communicate/ share site-specific arrangements, contextual safeguarding risks, alternative provision arrangements, extended provision arrangements, EYFS safeguarding and welfare arrangements as appropriate. Local information will remain consistent with this Trust-wide policy.

The Trust will monitor safeguarding compliance through an annual cycle of assurance, which may include policy review, safeguarding audits, single central record checks, training compliance checks, case file reviews, safeguarding governor or trustee reports, school visits, thematic reviews and reporting to the DMAT Board of Trustees.

This policy will be reviewed at least annually, and sooner if there are changes to legislation, statutory guidance, local safeguarding partnership procedures, Trust structure or safeguarding practice. The Trust Board is responsible for approving this policy, and each school is responsible for keeping its local contact list and local information up to date.

25. Policies and documents linked to Safeguarding and Child Protection

- The individual School's Behaviour Policy
- DMAT Code of Conduct for Employees
- DMAT Parent/ Carer Complaints Policy
- Individual School Health and safety Policy
- Individual School's Attendance Policy
- DMAT / DHS/ Laurels and Individual school's Information Communication Technology – Acceptable Use Policy
- Pupil AI Policy & Staff AI Policy
- Individual School's Mobile Phone Use Policy
- DMAT Equality, Diversity and Inclusion Policy
- Individual Schools Relationships, Health/ Sex Education Policy, as appropriate to school phase
- Individual schools First Aid [Early years providers should note the first aid requirements set out in the EYFS statutory framework
- DMAT Privacy notices for individual schools.
- DMAT Visitor Policy
- DMAT Whistleblowing Policy
- DMAT Safer Recruitment Policy

Appendix 1:

Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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 is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, 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 caregivers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2:

Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

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

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

Sexually motivated incidents in which an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

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

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

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

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

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

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

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

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

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

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

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

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

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

In EYFS settings, if a child is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts. Patterns and trends in a child's absence and their personal circumstances will be considered, along with professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

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

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

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the two.

DMAT schools have a zero-tolerance approach to sexual violence and sexual harassment. Schools recognise that even if there are no reports, this kind of abuse may be happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

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

Homelessness

Being homeless or at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (HBA), including FGM and forced marriage

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

FGM

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats, or coercion are not involved.

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

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual or transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures previously set out in this policy, as appropriate.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Non-collection of children

If a child is not collected at the end of the session/day, DMAT schools will follow their local protocols including how they inform parents/carers and how the incident is recorded.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, schools will follow their local protocols, including how they inform parents/carers and how the incident is recorded, and what actions, if any, are required to avoid repetition of such incidents.

Appendix 3:

Allegations Against Staff and Low-level Concerns Policy

Any concern or allegation about an adult working in or on behalf of a DMAT school (including a supply teacher, volunteer or contractor) must be reported without delay to the headteacher. Where the concern relates to the headteacher, it must be reported to the Chair of the Local Committee, in line with Trust procedures. Where the concern may meet the harm threshold, advice will be sought from the relevant Local Authority Designated Officer.

Allegations that meet the harm threshold are those in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If there is any doubt as to whether a concern meets the harm threshold, the DSL/ Headteacher/ Chair of Local Committee will consult the Local Authority Designated Officer (LADO).

Any allegation of abuse will be dealt with quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. Procedures for dealing with allegations will be applied with common sense and judgement.

If there is an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, safeguarding policies and procedures will be followed and the LADO will be informed.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available, and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the [local authority/academy trust]

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example,

if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. [Add further information here about the support available to individuals in your context, such as who they can turn to for advice – trade union representatives, or a colleague, for example – and any school / local authority / trust arrangements for welfare counselling or medical advice]

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority or children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

In Early Years settings, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Low Level Concerns

Low-level concerns about members of staff, including supply teachers, volunteers and contractors, that do not meet the harm threshold must still be reported, recorded and reviewed so that patterns of behaviour can be identified and addressed. Staff must feel confident to raise concerns about safeguarding practices and may use whistleblowing procedures where necessary.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

DMAT recognises the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns: The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the Trust or its schools 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 designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

DMAT recognises the importance of creating a culture of openness, trust and transparency in its schools to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the DMAT Staff Code of Conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken, and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school/Trust

Where a low-level concern relates to a supply teacher or contractor, The headteacher will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

DMAT and its schools will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance