Diocese of Hereford Multi-Academy Trust

Pembridge CofE Primary School

Safeguarding Policy 2026/27

INSPIRING LEARNING
THROUGH FAITH AND VALUES

Pembridge is a school where our creative teaching and learning is of the highest quality and where we encourage everyone to be inspired through faith in God and to live by Christian values so that our whole community flourishes and we reflect all that is 'worthy of praise'.

Review: September 2027

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1. Purpose

- **To reduce risk and prevent harm to children.**
- **To ensure the identification of, and the timely and appropriate responses to, risk and harm to children.**
- **To ensure that all adults in the school community understand their roles and responsibilities in respect of the above.**

2. Context

2.1 Pembridge C of E Primary School provides a universal service to children in our locality. School staff are closely involved, daily, with children and their families. Consequently, we have a critically important role towards the identification and prevention of harm and abuse.

2.2 This policy does not reiterate extensive sections of statutory guidance. It is a practical document that clarifies the roles and duties of **all adults** working in our schools and school communities. It should be used in conjunction with Keeping Children Safe in Education and with related school and Trust policies, as specified in section 7 of this policy. Keeping children safe in education 2026 (comes into force from 1 September 2026).

Primary schools and nurseries must adhere to additional requirements set out in EYFS statutory framework for group and school-based providers (1st September 2026).

2.3 We welcome our personal and professional safeguarding responsibilities, and it is our duty to maintain a professional working knowledge of relevant statutory guidance and of local arrangements as determined by Herefordshire Safeguarding Children Partnership. Welcome to the West Midlands Regional Safeguarding...

3. Definition of Safeguarding

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. This applies to **all children** in our care and in our communities. **Safeguarding is everyone's responsibility.**

3.1 Safeguarding means:

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

4. Definition of Child Protection

'*Child protection'* is the activity to protect specific children who are suffering, or who are likely to suffer, significant harm. Therefore, *protection* is a specific element of safeguarding, whereas safeguarding legislation in general is about the promotion of children's needs and the prevention of harm. This emphasises the need for all staff to be able to respond early when they have a concern rather than wait until this is more defined and certain.

At this point the involvement of services to protect the child(ren), including Children's Social Care, is statutory. The critical message from legislation that should inform all actions and decisions is that "**the child's welfare is paramount**."

5. Staff with additional safeguarding responsibilities

- Acting Executive Headteacher: Katie Froggatt
- Designated Safeguarding Lead: Katie Froggatt
- Deputy Designated Safeguarding Lead(s): Georgie Evans & Sarah Palmer
- Designated Teacher for children who are Looked After (LAC) and Previously Looked After (PLAC): Katie Froggatt
- Computing Lead
- Senior Mental Health Lead
- Safeguarding Link Governor
- Staff member with responsibility for protective security arrangements
- Senior leader responsible for filtering and monitoring

6. Local arrangements and useful contacts

6.1 West Midlands Regional Safeguarding

Twelve local authority areas collaborate with child safeguarding procedures. Each local area's multi-agency safeguarding arrangements are led by the statutory safeguarding partners/organisations: local authorities, integrated care boards and the police.

6.2 How to use the manual

Use this link to access Regional Statutory Safeguarding Guidance Welcome to the West Midlands Regional Safeguarding... For Local Area Specific Safeguarding Information and Procedures, please choose from the drop-down list to access the localised content for your local partnership.

6.3 Child protection referrals

Many of our Local Partnerships now use an online referral portal to submit a Multi-Agency Referral (MARF) See the area in which the child in question normally resides Welcome to the

West Midlands Regional Safeguarding… to identify the preferred local process. Usually it is advisable to discuss concerns, prior to the submission of a MARF, with the 'front door' to children's social care.

6.4 Quick reference contact details for essential local services

6.5 Advice and support for referral and assessment:

- MASH: 01432 260800 (8:45am-5:15pm)
- EDT: Out of hours or at weekends: 01905 768020
- Early Help Hub: 01432 260261

6.6 West Mercia Police:

- If a child is in immediate danger, telephone 999 and request the Police
- To contact the police to discuss a child protection or safeguarding concern, when a child is not in immediate danger, telephone 101
- You can also email the police to inform them of concerns and start a conversation with them at **contactus@westmercia.police.uk**

6.7 The Local Authority Designated Officer (LADO)

If you are concerned that an adult working with children may have harmed a child, please refer to the DHMAT allegations of abuse policy. This provides details about when to contact the LADO. If in doubt, contact the LADO.

Telephone: 01432 261739

LADO@herefordshire.gov.uk

6.8 Radicalisation

If you believe someone is in danger of being exploited or becoming radicalised, use school safeguarding and duty of care procedures to raise your concerns. Channel can then become involved if necessary. Anyone can call the national police Prevent advice line on **0800 011 3764**, in confidence, to share concerns with specially trained officers. The advice line is open 9am to 5pm every day.

You can also contact the Prevent team by emailing Prevent@westmercia.police.uk

Or you can report a concern using the Prevent referral form.

If you are concerned about someone who doesn't live in the county, you can use these contact details for advice.

As of 01/05/2026, The UK terrorist threat level has been raised to SEVERE – meaning an attack is highly likely.

For the public, this means remaining alert but not alarmed. If you are concerned, please speak to your local safer neighbourhood team. Visit Home | West Mercia Police to find out who your local officer is.

If you see anything that doesn't feel right report via gov.uk/ACT.

In an emergency always call 999.

Visit Current threat level in the UK | West Mercia Police for more information.

6.9 Additional support for online abuse

CEOP works to keep children safe from sexual abuse and grooming online. **CEOP are unable to respond to reports about bullying, fake accounts, or account hacking.** You can report to CEOP if you are concerned that a child is being sexually abused or groomed online. This might be from someone they know or someone they have only ever met online. CEOP are here to help and advise you and to make the child safe. If you have already reported your concern to your local statutory service, including children's social care or the police, you do not need to make a report to CEOP. If you think a child is in immediate danger, please call the police on 999. For more information relating to keeping children safe online from sexual exploitation and abuse you can visit our CEOP Education website for professionals.

7. Linked policies

This overarching policy is supplemented with the following policies:

DHMAT Central Policies

- DHMAT Central Safeguarding and Child Protection Policy and Quality Assurance cycle
- DHMAT Safer Recruitment Policy
- DHMAT Staff Code of Conduct
- DHMAT Allegations of abuse policy
- DHMAT Whistleblowing Policy
- DHMAT Low-Level Concerns Policy

Local School Policies

- Prevent Policy
- Online Safety Policy
- Child on Child abuse policy/protocol – see local arrangements Welcome to the West Midlands Regional Safeguarding...
- Relationships, Sex and Health Education policy (and PSHE Curriculum overview)
- Mental Well-being Policy
- Educational Visits Policy
- Attendance Policy
- Uncollected child policy
- Missing Child in Nursery policy

- Behaviour Management policy
- Restrictive Interventions policy
- Screening, Searching & Confiscation Policy
- Protective security protocol
- Supporting Pupils with Medical Conditions Policy (including allergy safety)
- Mobile phone policy

8. Safeguarding resources available to DHMAT schools

- All staff, in each school, use TES **MyConcern** for reporting and recording concerns about children.
- All staff, in each school, use TES **Staff Safeguarding** for reporting and recording concerns about staff conduct – this includes self-reporting.
- On behalf of its schools, the Trust subscribes to a range of services from **The Key**: for Leaders, for Safeguarding and for Governors.
- Schools use the CPD resources provided by the Key to plan and support professional learning across the school year:

  Safeguarding training planner and online calendar | The Key Safeguarding
- Governors use resources from the Key/Governorhub to support safeguarding monitoring visits to schools.
- Trust schools use **My New Term** and TES **Sentry** (Single Central Record software) to support our safer recruitment processes.
- Headteachers, DSLs and DDSLs use resources and updates provided in The **'DHMAT Safeguarding' Teams channel**.
- Schools maintain close links with their local safeguarding partnership and make use of learning events and resources.

9. Local Levels of Need Threshold Guidance

https://westmids-herefordshire.trixonline.co.uk/resources/local-guidance

9.1 **All staff** should possess a working knowledge of the local levels of need thresholds guidance. Reference to this guidance will inform the identification of risk and harm.

9.2 **Outline Levels of Need categories:**

- **Universal (Level 1)**: No additional support beyond that which is universally available.

- **Community-based Early Help (Level 2)**: Children and young people where some concerns are emerging and who require additional support, usually from professionals already involved with them (Threshold to Consider Early Help Assessment **EHA**).
- **Targeted Early Help - Family Help (Level 3)**: Children and young people who are causing significant concern or where concerns recur frequently (Threshold to initiate **EHA**).
- **Specialist (Level 4)**: Children and young people who are very vulnerable. (Threshold to refer to Children's Social Care).

9.3 **Early Intervention**: It is generally expected that referrals to children's social care would follow significant input at levels 2 and 3.

9.4 The School **Early Help Offer** is published online and sets out the range of services and assistance that school provides or arranges for children and families.

10. The 4 categories of abuse

10.1 Child abuse is the maltreatment of a child by another person - by adults or children. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Abuse, including neglect, and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. **All referrals to children's social care will be under one or more of these broad categories of abuse.**

10.2 **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.

10.3 **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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

10.4 **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.

10.5 **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 emotional needs.

11. Child on Child abuse overview

11.1 **Allegations of abuse made against other pupils**

We recognise that children are capable of the abuse of other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. All child-on-child abuse is unacceptable and will be taken seriously.

We understand that harmful sexual behaviour (HSB) exists on a continuum and may escalate into sexual harassment or sexual violence. We recognise the importance of:

- Understanding the distinction between HSB, sexual harassment and sexual violence
- Early identification and intervention to minimise risks
- Understanding age-appropriate sexual development and behaviour
- Recognising that misogyny and misandry are escalatory, and early identification minimises the risks of HSB, sexual harassment and sexual violence

Staff are trained to understand that HSB can occur between children of any age and exists on a continuum which may escalate.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes or semi-nudes)
- Involves misogyny or misandry (which are escalatory and require early identification)

11.2 **Making or sharing of nudes or semi-nudes**

This includes consensual and non-consensual making and sharing of nude and semi-nude images and/or videos. This also explicitly includes images digitally altered or wholly generated by artificial intelligence (e.g., deepfakes). All such incidents mandate a safeguarding response, regardless of whether they are consensual or not. Keeping Children Safe in Education (KCSIE): September 2026 changes (The Key Leaders)

Please refer to our Online Safety Policy. Our approach is based on guidance from the UK Council for Child Internet Safety (https://www.gov.uk/government/organisations/uk-council-for-internet-safety)

11.3 **Procedures for dealing with allegations of child-on-child abuse**

- If a pupil makes an allegation of abuse against another pupil: You must record the allegation on MyConcern and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

11.4 **Creating a school culture to minimise the risk of abuse**

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images
- Recognise that addressing inappropriate behaviour can help prevent abusive/violent behaviour – dismissing behaviour such as grabbing, flicking bras and lifting up skirts risks normalising them

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence that might impact, more typically, on boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse
- Ensure staff reassure victims that they are being taken seriously
- Conduct pupil voice surveys and interviews (followed up to ensure impact and efficacy) about site safety and pupil safety, at least annually

11.5 **We ensure staff are trained to understand:**

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

11.6 **Filtering and Monitoring**

Our governing board ensures that:

- Appropriate filtering and monitoring systems are in place on school devices and school networks to limit children's exposure to online safety risks
- **These systems are reviewed for effectiveness at least once every academic year**
- **Reviews are carried out by the senior leader responsible for filtering and monitoring, supported by the DSL and IT support**
- Records of these reviews are maintained
- **Filtering and monitoring requirements apply to the use of generative AI**

The review considers:

- The number and age range of pupils

- Those potentially at greater risk of harm
- How often pupils access IT systems
- The proportionality of costs versus safeguarding risks
- The DfE's filtering and monitoring standards

We are careful that 'over-blocking' does not lead to unreasonable restrictions on what pupils can be taught. The appropriateness of our filtering and monitoring systems is informed by the risk assessment required by the Prevent duty.

11.7 **Mobile Phones in School**

All schools are expected to implement a policy where pupils don't have access to their phones at all during the school day. This includes lessons, breaktimes and lunchtimes, creating a mobile phone-free environment.

Our **Mobile Phone Policy** sets out our approach in detail, including:

- When and where pupils may not use mobile phones
- How mobile phones should be stored during the school day
- Sanctions for non-compliance
- Exceptions for specific circumstances (e.g. medical needs)

See our separate **Mobile Phone Policy** for full details.

11.8 **Generative AI**

We recognise that generative AI presents both opportunities and risks for safeguarding. Our approach to the educational use of generative AI addresses safeguarding, data protection and ethical risks.

Our filtering and monitoring systems include consideration of generative AI use. Staff receive training on the safeguarding implications of AI, including:

- The creation of deepfake images (nudes or semi-nudes)
- Data protection concerns
- Age-appropriate use
- Misinformation and harmful content generation

See our **Online Safety Policy** for further details on our approach to AI in education.

11.9 **Supporting Children Who Are Questioning Their Gender**

Our Approach

We recognise that sometimes young children go through a period of questioning their gender, but for the majority this will not continue into adulthood. We will:

- Take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious
- Be aware of the potential vulnerabilities of these children (e.g. complex mental health and psychosocial needs relating to relationships with family and peers, or their broader social environment)
- Consider adopting policies that maintain flexibility and avoid rigid rules based on gender stereotypes
- Take a strong, proactive stand against all forms of bullying, including misogyny and misandry
- Actively involve parents/carers as a matter of priority where a child who is questioning their gender asks for support, and treat their views with importance, unless there are exceptionally rare circumstances where doing this would constitute a greater risk to the child than not involving them Keeping Children Safe in Education (KCSIE): September 2026 changes (The Key Leaders)

Social Transition

Schools must not initiate any action regarding social transition; they should only respond if a child or their parent specifically requests it.

Primary schools must exercise "particular caution" and the guidance states that support for full social transition should be agreed "very rarely".

Staff must not adopt any changes relating to social transition without a decision involving the parents, except in exceptionally rare cases where doing so would pose a greater risk to the child.

When responding to requests for support with social transition, we will:

- Document our decision-making process and keep detailed records
- Ensure decisions are based on:
    - Our statutory duty to safeguard and promote the welfare of all children
    - The importance of actively involving parents/carers as a matter of priority
    - Taking a very careful approach to social transition
    - Our obligations under the Equality Act 2010 and Human Rights Act 1998
    - An assessment that considers the welfare and best interests of the child and other children

School Premises and Facilities

Schools must not allow children into toilets, changing rooms, and boarding/residential accommodation designated for the opposite biological sex. No exceptions are permitted, even when supporting a child's social transition. Keeping Children Safe in Education (KCSIE): September 2026 changes (The Key Leaders)

If a pupil who is questioning their gender does not want to use the facilities designated for their biological sex, we will consider providing alternative facilities that:

- Do not compromise the provision of single-sex facilities
- Do not compromise the safety, comfort, privacy or dignity of the child or any other children
- For mixed-sex toilets (if provided in addition to single-sex facilities): are individual, lockable rooms that open directly onto public areas

We will keep records of these situations, communicate them appropriately with relevant staff, and review them regularly.

Sports and PE

Schools must maintain single-sex spaces including sports separated by biological sex. There is no exception for pupils who are socially transitioning.

We must ensure that some sports are played as single-sex sports from a certain age to ensure children's safety. There must be no exceptions in these sports, including for children who wish to socially transition.

Other sports may be segregated according to biological sex on the grounds of fairness. This applies to participation in any sport, game, or activity of a competitive nature where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This segregation is not considered discriminatory under the Equality Act 2010.

Where there are no safety concerns, we will consider any request a child makes regarding how they participate in sports in line with:

- The best interests of the child
- The impact on other children
- The aim of creating a safe and fair environment for all children to participate in PE

Recording Information

Schools are legally required to record a child's biological sex accurately wherever it is recorded.

Reviewing Decisions

Schools should review any decisions made regarding support for children questioning their gender regularly, and whenever circumstances change.

12. Preventing radicalisation

12.1 **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

12.2 **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

12.3 **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 is 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 being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police.

12.4 We will ensure that suitable internet filtering and monitoring is in place and equip our pupils to stay safe online at school and at home. **See separate online safety policy**

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

Staff will be alert to changes in pupils' behaviour. Educate Against Hate provides useful resources to identify indicators of possible radicalisation.
https://www.educateagainsthate.com

13. Our personal roles and responsibilities towards the recognition of needs, harm and abuse

13.1 **Recognise:** It is important that everyone working with children should be able to recognise the signs of possible abuse and neglect. It is not adequate to wait for disclosure as the primary means of detecting child abuse. The recognition and identification of signs of potential abuse will form part of our continuous professional development.

13.2 **Respond:** All adults in school are 'Trusted Adults' and are emotionally available to children - a crucial aspect of our safeguarding culture. We will not ignore harmful behaviours or actions. We are prepared to respond appropriately to concerns and disclosures of abuse from children.

13.3 **Record/Report:** It is our duty to record first-hand, in writing, concerns and disclosures about children. This will be done promptly and securely using our safeguarding case management software MyConcern. All staff will be supplied with log-in details for MyConcern and are expected to make appropriate use of the system.

13.4 **In cases of serious risk or harm to a child, an immediate verbal alert to the DSL is required.** The DSL responds to and manages all actions, case notes and chronologies via MyConcern.

13.5 **Refer:** The DSL will triage all concerns promptly against levels of need thresholds guidance. In normal circumstances, the DSL will decide the most appropriate action. At Levels 3&4 this will normally be in consultation with the 'front door' to children's social care. Usually, the Designated Safeguarding Lead will determine the level of concern and refer to external agencies. In the absence of the DSL/DDSL, or if there is disagreement about levels of risk or harm, **any staff member can make a referral to Children's Social Care** and should notify the DSL as soon as possible.

13.6 **Female Genital Mutilation (FGM):** Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. **This individual responsibility must not be delegated.**

14. Continuous professional development underpins a healthy safeguarding culture in our school

In the complex and evolving field of safeguarding, effective practice is best ensured through a programme of continuous professional development (CPD).

14.1 All staff members will receive input about safeguarding and child protection at induction. This will include:

- Current KCSIE guidance
- School Policies, including pupil behaviour
- The staff code of conduct
- Low Level Concerns policy
- Allegations of Abuse against Staff and Whistle-blowing procedures
- Online safety

This is to ensure that staff understand the school's safeguarding systems, their responsibilities, and can identify signs of possible abuse or neglect.

Professional learning will be continually updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff learning and curriculum planning
- Be in line with advice from the Local Safeguarding Children Partnership
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment;
    - Have a clear understanding of the needs of all pupils

Staff will receive regular safeguarding and child protection updates (through emails, e-bulletins, and staff meetings) and enhanced by the termly Safeguarding CPD programme.

Weekly safeguarding briefings must include updates on:

- **New terminology: "making or sharing of nudes or semi-nudes" (including AI-generated images)**
- **Harmful sexual behaviour continuum**
- **Misogyny and misandry as escalatory factors**
- **Filtering and monitoring requirements**
- **Mobile phone policy**

Staff will receive annual safeguarding INSET and updates, each autumn term, prior to the return to school of children.

14.2 Contractors

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

14.3 Volunteers

Any person volunteering in a role that involves teaching, training, instructing or supervising children frequently, overnight or more than 3 days in a 30-day period is in regulated activity. This is a result of the Crime and Policing Act 2026. Such volunteers must have an enhanced DBS check including children's barred list information.

The 'supervision exemption' that previously applied to volunteers has been removed.

Regulated activity also includes:

- Providing advice or guidance on physical, emotional or educational wellbeing
- Driving a vehicle only for children

All volunteers will receive appropriate safeguarding training relevant to their role. See our DHMAT Safer Recruitment Policy for full details on volunteer vetting procedures.

14.4 Prevent Training - All staff receive appropriate development on the government's anti-radicalisation strategy, **Prevent**, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Learning needs will be identified in accordance with locally perceived threat in your Prevent risk assessment. The risk assessment is statutory and should be revised in accordance with current information from West Mercia Police.
Visit Current threat level in the UK | West Mercia Police for more information. Training must be completed by all new staff and governors and at least every 3 years, unless more urgent need is apparent.

14.5 Wider societal factors beyond school - Staff receive regular input regarding contextual safeguarding (the areas of safeguarding specific to the location of the school). This information is enhanced by data of reported crime in our locality available online from West Mercia Police. Overall crime falls across West Mercia – but serious offences against women continue to rise |

West Mercia PCC Figures published by the Office for National Statistics (ONS) show a mixed picture for West Mercia, with overall crime continuing to fall while serious offences disproportionately perpetrated by men against women have increased. Over the 12 months to March 2026, West Mercia recorded sharp rises in stalking and harassment (+11%), and sexual offences (+8%). These trends reflect national concerns about violence against women and girls. Increases were also seen in drug offences (+9%) and miscellaneous crimes against society* (+14%). Despite this, overall recorded crime in West Mercia has fallen by 1%, with several high-volume offences continuing to decline. Notable reductions include:

- Vehicle crime (-23%)
- Public order offences (-9%)
- Shoplifting (-7%)
- Theft offences (-9%)
- Burglary (-7%)

14.6 The DSL and Deputy DSLs will undertake appropriate child protection and safeguarding training (as set out in KCSIE) at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

14.7 All Governors (LGB) should regularly update learning about safeguarding to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities i.e. support and challenge.

All governors must read Part 1 of KCSIE in full to understand their safeguarding responsibilities.

It is advisable for the link safeguarding member/governor to attend DSL level CPD every 2 years.

14.8 Safer Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training within the previous 3 years. The Trust advocates the use of the safer recruitment training module on The Key.

14.9 Staff who have pastoral contact with pupils and families will receive regular supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

15. Roles and functions within our school and the Trust

(for full detail please refer to DHMAT Central Safeguarding Policy)

15.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to **all adults** working in our school, including:

- All permanent and temporary staff
- Supply teachers

- Trainee teachers
- Volunteers
- Contractors
- Governors and trustees

This policy and procedures are consistent with the procedures of *(delete as appropriate)*:

- Home Page - Herefordshire Safeguarding Boards and Partnerships
- Shropshire Safeguarding Community Partnership
- Worcestershire Safeguarding Partnership

Our policy and procedures also apply to extended school and off-site activities.

15.2 All staff will read and understand Part 1 in full of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

15.3 All staff will sign a declaration (marked as 'read and understood' when administered via MyConcern) at the beginning of each academic year to say that they have reviewed the guidance.

15.4 All staff will be aware of:

- Our systems which 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 deputies
    - The behaviour and online safety policies
    - The mobile phone policy
    - The safeguarding response to children who go missing from education

The process for community-based Early Help and targeted Early Help (Family Help), and their role in it, including:

- The identification of emerging problems
- Liaison with the DSL
- Sharing information with other professionals to support early identification and assessment

Referral processes:

- 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

Signs of abuse and specific safeguarding issues:

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as:
    - Child-on-child abuse
    - Harmful sexual behaviour (HSB) and understanding the HSB continuum
    - Child sexual exploitation (CSE)
    - Child criminal exploitation (CCE)
    - Serious violent crime, including physical assault and carrying, threatening with or using weapons
    - FGM
    - Radicalisation
    - Making or sharing of nudes or semi-nudes, including AI-generated images (deepfakes)
    - Misogyny and misandry as escalatory factors

Supporting victims:

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

Mental Health:

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. Examples include self-harm, suicidal ideation and risk of suicide. Mental health problems can also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Potential warning signs that staff are well placed to recognise include:

- Significant changes in behaviour
- Difficulty sleeping
- Physical signs of self-harm

Only trained professionals should attempt to make a diagnosis of a mental health problem, but all staff should:

- Observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one

- Report any mental health concern about a child that is also a safeguarding concern immediately by following our child protection policy and speaking to the DSL or deputy

If staff feel that a child is in immediate danger, they should:

- **Call 999, or**
- **Take the child to A&E**

Schools should make sure any mental health interventions they offer are safe, effective and appropriate for the child's needs.

Our school will make use of support from our Mental Health Support Team (MHST) where available.

Serious Violence:

All staff should be aware of indicators that children may be at risk from, or involved in, serious violent crime, including:

- Physical assault, and carrying, threatening with or using weapons
- Increased absence from school
- Changing friendships, or forming friendships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or assault, or unexplained injuries
- Significant change in wellbeing
- Unexplained gifts or possessions

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (DSL) or deputy.

The DSL or deputy will:

- Assess the risk
- Consider referral to police and/or children's social care
- Consider whether information should be shared with a receiving school if a child transfers.

Staff should be aware that:

- The risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, or time in alternative provision) or a history of offending
- Staff should stay alert to when children might be at highest risk around the school day (e.g. straight after school)
- Early, evidence-based support is essential for those considered at risk (e.g. targeted mentoring or therapeutic support)

Data Protection:

Staff are aware of their obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

Staff are aware that data protection regulations do not prevent information sharing for the purpose of keeping children safe.

Alternative Provision:

We ensure any alternative provision placements meet the national standards for non-school alternative provision and that appropriate safeguarding arrangements are in place. We obtain written confirmation from the AP provider that appropriate safeguarding checks have been carried out on anyone working at that provision.

16. The Designated Safeguarding Lead (DSL)

Is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of hours email contact: k.froggatt@dhmat.org.uk

When the DSL is absent, the deputies will act as cover including out of hours and out of term activities.

The school has implemented robust cover arrangements for when the DSL is unavailable, including a confidential shared mailbox to ensure safeguarding concerns are received, monitored and acted on without delay.

16.1 The DSL will be given the time, funding, training, resources and support to:

- 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 the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- When transferring child protection files to a new school, include a summary setting out the current safeguarding concerns, relevant context, and any ongoing support needs
- Take particular care to distinguish between current safeguarding concerns and historic information to ensure past issues are presented with appropriate context
- Oversee the annual review of filtering and monitoring systems
- Report to LGB termly on the standard report template

The DSL will also liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description and in Annex B of KCSIE.

17. The LGB

Facilitates a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The LGB will:

- Evaluate and approve this policy at each review
- Ensure it complies with the law
- Hold the Headteacher to account for its implementation
- Appoint a lead 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 governors read KCSIE in full
- Make themselves aware of, and follow, their local safeguarding partnership arrangements
- Be prepared to supply information requested by the safeguarding partners
- Understand the local criteria for action and protocol for assessment, and make sure these are reflected in school policies and procedures
- Ensure the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensure all staff undertake appropriate safeguarding and child protection training and update this regularly
- Ensure the school has an effective mobile phone policy in place
- Ensure filtering and monitoring systems are reviewed at least annually
- Ensure arrangements are in place to support pupils with medical conditions, including allergy safety policies

Section 19 of this policy has information on how governors are supported to fulfil their role.

18. The Headteacher

Is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff, supply teachers, trainee teachers) and volunteers:

- Are informed of our systems which 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

Communication and resources:

- Communicating this policy to parents when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update the content of this training regularly
- Ensuring a designated senior leader is responsible for filtering and monitoring, working with the DSL and IT support.

Allegations management:

- 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)

Early Years requirements (where applicable):

- Ensuring the relevant staffing ratios are met, where applicable (nursery)
- Making sure each child in the Early Years Foundation Stage is assigned a key person

Compliance:

- Ensuring all recruitment procedures follow safeguarding best practice, including compliance with the Crime and Policing Act 2026 regarding the new definition of regulated activity and removal of the supervision exemption for volunteers
- Ensuring the school has implemented a mobile phone policy whereby pupils do not have access to their mobile phones during the school day
- Ensuring arrangements are in place to support pupils with medical conditions, including allergy safety policies

19. Leadership and management towards an effective culture

Leaders must create a culture in which all staff, trustees and visitors understand how to raise concerns and feel supported to do so.

Governors should ensure that they have a clear understanding of the local risks that are applicable to the demographic of the school.

Governors should ask challenging questions of leaders' assertions and 'triangulate' these assertions to assure themselves of the effective application of policies and procedures.

Leaders and governors must ensure:

- A whole-school approach to safeguarding
- That safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Regular monitoring and review of safeguarding arrangements
- That the school's safeguarding culture is one where staff feel confident to report concerns
- Compliance with all statutory requirements set out in KCSIE

APPENDIX 1: Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026, and the Governance Handbook.

We comply with this guidance and the arrangements agreed and published by our local safeguarding partnership.

This policy is also based on the following legislation:

- Section 157/175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- The Crime and Policing Act 2026, which changed the definition of regulated activity and removed the supervision exemption for volunteers
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The 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

- The UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025, which govern data protection and information sharing
- The Equality Act 2010 and Human Rights Act 1998, which schools must comply with when making decisions about safeguarding

This policy meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

This policy also complies with our funding agreement and articles of association.

APPENDIX 2: Equalities and additional risk factors

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

We will ensure appropriate consideration of children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Have family members in prison

Young Carers

Caring responsibilities can impact pupils:

- Attendance
- Attainment
- Behaviour
- Wellbeing

Early identification of young carers and their needs is essential to make sure they receive the right support from appropriate services. All staff should be alert to the needs of young carers and recognise the impact caring responsibilities can have on children's safeguarding and welfare.

Children with Medical Conditions

We must make a safeguarding referral if we have concerns that a child might be at increased risk of being neglected, abused or exploited because of their medical condition.

This might include situations where:

- Our school is not provided with relevant information about their medical condition
- A child is repeatedly sent to school without essential medication

We follow updated guidance on supporting pupils at school with medical needs and allergy safety. See our Supporting Pupils with Medical Conditions Policy for further details.

Additional Information on Specific Safeguarding Issues

Annex A of KCSIE contains important additional information about specific forms of abuse and safeguarding issues, including:

- Children with family members in prison
- Cybercrime (including Computer Misuse Act 1990 offences)
- Domestic abuse (Operation Encompass)
- Homelessness (including the temporary accommodation notification duty)
- Preventing radicalisation (Channel)
- Serious violence
- Online safety and support

School and college leaders and those staff who work directly with children should read this annex.

Should staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately.

This is a valuable supplement to our awareness of risk and harm and is available from the link below for frequent reference:

Keeping Children Safe in Education: Keeping children safe in education 2026 (comes into force from 1 September 2026)

APPENDIX 3: Police and Criminal Evidence Act (1984) – Code C

1. The Headteacher, Designated Safeguarding Lead (DSL) and deputy (DDSL) are aware of the requirement for children to have an appropriate adult when in contact with Police officers.
2. PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for these purposes.
3. PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.
4. If a police officer arrives at the school wishing to speak with a pupil, the receptionist will inform the principal and the DSL and follow the visitor's policy. The DSL will ensure that arrangements are made to inform parents that this is the case and seek their presence at the school as the appropriate adult. If for any reason the parent cannot attend to be an appropriate adult the DSL or Principal will ensure that an appropriate adult is provided from the school leadership team.
5. The DSL (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on our online safeguarding system.
6. If having been informed of the vulnerabilities, the DSL (or deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns immediately.
7. A person whom there are grounds to suspect of an offence must be cautioned[1] before questioned about an offence[2], or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.
8. A Police Officer must not caution a child or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.
9. The 'appropriate adult' means, in the case of a child:
    - The parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
    - A social worker of a local authority or, failing these, some other responsible adult aged 18 or over who is not:
        - Police officer
        - Employed by the police
        - Under the direction or control of the chief officer of a police force; or

- A person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions

Further information can be found in the Statutory guidance - PACE Code C 2019.

Footnotes:

[1] The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

[2] A person need not be cautioned if questions are for other necessary purposes, e.g. (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.