



Sapientia Education Trust

Safeguarding Policy

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PURPOSE AND AIMS

The purpose of Sapientia Education Trust's Safeguarding policy is to ensure every child who is a registered student at our schools, regardless of age, is safe and protected from harm. This means we will always work to:

- Protect children and young people at our schools from maltreatment;
- Prevent impairment of our children's and young people's health or development;
- Ensure that children and young people at our schools grow up in circumstances consistent with the provision of safe and effective care; and
- Undertake that role so as to enable children and young people at our schools to have the best outcomes.

Each school within the Sapientia Education Trust (the Trust) holds their own local Safeguarding policy and must adhere to the most up to date statutory guidance *Keeping Children Safe in Education (KCSIE)*. Each school's Safeguarding policy is the responsibility of the school's Designated Safeguard Lead (DSL) and can be found on the schools' websites or from their reception.

This policy is available from the Central Team offices or can be found on the Trust website.

In addition, the Trust has a separate Human Resources Resourcing Policy, which is available from the Human Resources team.

ETHOS

The child's welfare is of paramount importance. The Trust will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children within our will be able to talk freely to any 'adult' if they are worried or concerned about something. All 'adults' will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

All 'adults' who come into contact with students and their families have a role to play in safeguarding students. We recognise that staff within our Trust play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff should maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child.

We ensure that safeguarding and child protection is at the forefront and underpins all relevant aspects of process and policy development. We operate with the best interests of the child at heart.

The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

ROLES AND RESPONSIBILITIES

Role	Name	Contact details
Director of Safeguarding and Attendance	Michelle Atkinson	m.atkinson@setrust.co.uk
Chief Executive Officer	Jonathan Taylor	ceo@setrust.co.uk
Named Safeguarding Trustee	Roger Margand	clerk@setrust.co.uk
Chair of the Board of Trustees	Peter Rout	clerk@setrust.co.uk

This policy must be read by all employees of the Trust Central Team. They are also responsible for familiarising themselves with policy and key individuals (Headteacher and DSLs) at each individual school that they visit.

The Board of Trustees

The Board of Trustees at the Trust is accountable for ensuring the effectiveness of this policy and our compliance with it. Trustees will ensure they facilitate a whole Trust approach to safeguarding. This means ensuring safeguarding and child protection is at the forefront and underpins all relevant aspects of process and policy development. Although the Trustees take collective responsibility to safeguard and promote the welfare of our pupils, we also have a named Trustee Roger Margand who champions safeguarding across the Trust.

The Board of Trustees of the Trust will ensure that:

- The safeguarding policy is in place at Trust and school level, is reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt, available publicly via our school website and has been written in line with Local Authority guidance and the requirements of Norfolk & Suffolk safeguarding partnership;
- Each school's safeguarding and child protection policy is effective by:
 - Reflecting the whole school/college approach to child-on-child abuse, the recognition of it and the different forms it may take;
 - Reflecting reporting systems;
 - Describing procedures which are in accordance with government guidance;
 - Referring to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners;
 - Being reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt; and
 - Being available publicly either via the school or college website or by other means.
- Each school has a behaviour policy which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- The Trust has a staff code of conduct in place which should, amongst other things, include acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media;
- Each school has appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions;
- The school contributes to inter-agency working in line with Working Together to Safeguard Children (2023);
- A senior member of staff from the leadership team in each school is designated to take the lead responsibility for safeguarding and child protection and that there is at least one Deputy Designated Safeguarding Lead (DDSL) who is an appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role (in term time and during school or college hours). The role will be evidenced explicitly in the role holder's job description;
- All staff receive a safeguarding induction *before* commencing work and are provided with a copy of this policy, Part One and Annex B of KCSIE, the staff code of conduct, the behaviour policy and the school's safeguarding response for those pupils who are routinely absent from education as detailed in section 6 of this policy;
- All staff undertake appropriate safeguarding and child protection (including online safety) training that is updated annually;
- Procedures are in place for dealing with allegations against members of staff, supply staff and volunteers in line with statutory and SET guidance; and
- Safer recruitment practices are followed in accordance with the requirements of 'KCSIE 2025'.

The Trustees (via the Education committee) will receive a safeguarding update from each school, at least 3 times a year, as part of the Head Teacher's report.

Trust compliance

The Sapientia Education Trust will ensure that:

- This policy is effectively implemented through the Trust's safeguarding strategy;
- Regular quality assurance activities are completed at all schools to assess the effectiveness of the school's safeguarding arrangements;
- Headteacher and DSLs are provided with a written report containing actions and recommendations to ensure safeguarding requirements are met;
- Ongoing safeguarding training is made available to DSLs and ADSLs;
- DSLs, DDSLs and HTs are supported in their roles;
- DSLs and DDSLs are part of the Sapientia DSL Network; and
- Remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

The Trust Safeguarding team has the right to access individual pupil safeguarding files for the purpose of quality assurance, support, guidance, and direction.

Schools

All schools are responsible for implementing their local Safeguarding policy. They must ensure that they provide all students with a safe and secure learning environment. Schools must appoint a member of the Senior Leadership Team to the role of Designated Safeguarding Lead (DSL).

Each school should also appoint at least one DDSL, some schools will have more than one DDSL. Individual schools are also responsible for ensuring all staff have received the appropriate level of safeguarding training to undertake their role.

Designated Safeguarding Leads (DSL)

The Designated Safeguarding Lead is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection within our school. The DSL will carry out their role in accordance with the responsibilities outlined in Annex C of 'KCSIE 2025' including but not limited to:

- o The DSLs and DDSLs will undergo suitable training, including Prevent training, to equip them with the skills and knowledge required to undertake their role, which will be updated at a minimum every two years; in addition, their skills and knowledge will be refreshed at regular intervals, annually at a minimum. All training will be in line with Norfolk or Suffolk Safeguarding Partnership;
- o The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded using MyConcern;
- o During term time the DSL and/or a DDSL will always be available (during school or college hours) for staff in the school to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on the school site in person, we will ensure that they are available via telephone and/or any other relevant media. Alternatively, contact can be made with the SET Director of Safeguarding and Attendance – Michelle Atkinson;
- o The DSL will regularly provide staff, pupils, parents, and carers with signposting information for reporting safeguarding concerns out of school hours and during school holidays;
- o The DSL or DDSLs will represent our school at child protection conference, core group meetings and other meetings. They will liaise with Children's Services and other agencies where necessary;
- o The DSL or DDSLs will make referrals to Children's Services and other agencies when required;
- o The DSL and DDSLs will maintain up to date records and child protection files ensuring that they are kept confidential and stored securely using MyConcern;
- o The DSL will ensure all adults undergo appropriate safeguarding training, to give them the necessary skills and knowledge to perform their safeguarding duties;
- o The DSL is responsible for ensuring that all staff members, supply staff and volunteers are aware of our policy and the procedure they need to follow.
- o Work with those who are responsible for attendance, behaviour and SEND within the school;
- o The DSL and DDSLs will work with the headteacher and senior leaders, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement; and
- o The DSL and DDSLs are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence, as outlined in the Police and Criminal Evidence Act (1984) – Code C.

The appropriate adult¹ means, in the case of a child:

- the parent, guardian or, if the juvenile 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:
 - a 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,

The Police and Criminal Evidence Act 1984 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 the purposes of the code.

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.

The DSL 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 MyConcern.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², 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.

A Police Officer must not caution a juvenile 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.

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

TRAINING AND INDUCTION

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.

When new staff, volunteers or regular visitors join the Trust Central Team, they will be informed of the safeguarding arrangements in place. They will be given a copy of the Trust's Safeguarding policy and the Staff Code of Conduct.

All members of the Trust Central Team will receive training via the Trust or delivered by a Trust school as appropriate as part of their induction.

The training will include safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record any issues of confidentiality, and how to pass this information on. The induction will also remind staff and volunteers of their responsibility to safeguard all children at our schools and the remit of the role of the Designated Safeguarding Lead. They are also required to complete a number of online training modules. As part of their induction, all staff will be provided with a copy of Part One and Annex B of the most up to date '*Keeping Children Safe in Education*' (or equivalent) and will be expected to read and show an understanding of its content.

In addition to the safeguarding induction, all members of staff will undertake appropriate safeguarding training every academic year with additional updates as required.

The Trust Members and Trustees will also undertake appropriate safeguarding training every academic year with additional updates as required to ensure they are able to carry out their duty to safeguard all children at our schools.

PROCEDURES FOR MANAGING CONCERNS REGARDING CHILDREN (STUDENTS).

Each school within the Trust has a clear procedure for responding to any possible signs of abuse, as outlined in their Safeguarding policy. It is the responsibility of each Central Team staff member to ask for a summary of key safeguarding information relevant to the school that they are visiting. Each school publishes their Safeguarding policy on their website and should be consulted for further information and detail if required.

If a member of the Central Team has a safeguarding concern about a student, they must ask to speak to the DSL or, in their absence, an DDSL, to whom the concern must be reported. This must be done as soon as practically possible, and under no circumstances should the reporting of a concern be delayed.

Any safeguarding concern reported verbally to a DSL, or the DDSL must be recorded in writing, in line with the school's recording procedures.

It is **not** the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. **All staff**, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

Within 1 working day of a concern being raised, the DSL will consider what action to take which may include seeking advice from the schools Local Safeguarding

Partnership, as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Headteacher in the first instance. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact the Trust Director of Safeguarding and Attendance, Michelle Atkinson, and/or the school's Local Safeguarding Partnership directly with their concerns.

SPECIFIC SAFEGUARDING ISSUES.

All staff (including visitors, volunteers, supply staff and contractors) working in our schools are in a unique position to identify and respond to signs of abuse. It is important that our staff can recognise the different forms of abuse which they may encounter.

As part of their training, all members of the Central Team are trained to understand and recognise the different types of abuse.

Further information can be found in Annex 1 on the different specific safeguarding issues.

SAFER RECRUITMENT

At the Trust, we use the recruitment and selection process to deter and reject unsuitable candidates from applying for or securing employment, or volunteering opportunities within the Central Team. We will ensure that at least one member of the interview panel has completed appropriate safer recruitment training. At all times we will ensure that safer recruitment practices are followed in accordance with the requirements of 'KCSIE 2025' and the Trust's Resourcing Policy.

At the Trust, we use a range of selection techniques to identify the most suitable person for the post. Structured questions are agreed by the interview panel and any potential areas of concern are explored to determine the applicant's suitability to work with children.

We will maintain a Single Central Register (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements.

SAFER WORKING PRACTICES

All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident, and safe to do so. All 'adults' will be provided with a copy of the Trust's Code of Conduct at induction. They will also receive a copy of '[Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#)' (February 2022), which provides additional guidance. All staff, supply staff and volunteers are

expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

All Trust Central Team staff are supplied with an ID badge and are required to wear them at all times when conducting work on behalf of the Trust.

Schools should cross-reference their Trust Safeguarding Agreement letter containing all approved Trust staff when new Trust Central Team staff visit their school.

MANAGING ALLEGATIONS AGAINST STAFF AND VOLUNTEERS

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. **All** concerns whether perceived as low level or not, should be reported as outlined in this policy.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. We work to the thresholds for harm as set out in '[Working Together to Safeguard Children](#)' (2023) and '[KCSIE](#)' 2025 below. An allegation may relate to a person who works / volunteers with children who has:

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

The 4th bullet point above recognises circumstances where a member of staff (including supply teachers) or volunteer is involved in an incident outside of school/college which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

At the Trust, we recognise our responsibility to report / refer allegations or behaviours of concern and / or harm to children by adults in positions of trust who are not employed by the School (this includes individuals / organisations using the school premises) to the Local Authority Designated Officer service of the Local Safeguarding Partnership.

We will take all possible steps to safeguard our children and to ensure that the adults in our schools are safe to work with children. We will always ensure that the procedures outlined in the SET guidance for safeguarding complaints against adults, Norfolk and Suffolk Local Authority local protocol and Part 4 of '[KCSIE 2025](#)' are adhered to and will seek appropriate advice. The first point of contact for schools regarding LADO issues is via the Norfolk/Suffolk Local Authority Duty Desk on

Norfolk: LADO@norfolk.gov.uk

Suffolk: LADO@suffolk.gov.uk

If a member of the Trust has a concern about a member of staff (including supply staff, volunteers and visiting adults) within a school, they must raise this directly with the Headteacher. If the concern is about the Headteacher they this should be referred to Jonathan Taylor (CEO) or Tina Smith (SET Director of HR) if Jonathan is unavailable. If there is a concern about an adult who is a member of the Sapientia Education Trust Central team (including Trustees), this should be referred to Jonathan Taylor (CEO). If there is a concern about Jonathan Taylor this should be referred to Peter Rout (Chair of the Board of Trustees).

The Headteacher, SET CEO or SET Director of HR will seek advice from the LADO within 24 hours of the concern being raised. No member of staff will undertake further investigations before receiving advice from the LADO. A risk assessment will also be undertaken to determine if the individual(s) work duties need amending. If an allegation is made against a member of an external organisation, the organisation will be fully involved in any enquiries from the LADO, police and/or children social services.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Trust CEO or Chair of the Board of Trustees, should contact the LADO directly (Norfolk LADO can be contacted on LADO@norfolk.gov.uk and the Suffolk LADO on LADO@suffolk.gov.uk).

Further national guidance can be found at: [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: help@nspcc.org.uk

The Trust has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.

If these circumstances arise in relation to a member of staff at our schools, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR and in line with the most recent KCSIE.

Concerns that do not meet the harm threshold

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. Our process is to consult all concerns, regardless of perceived level of concern, with Local Safeguarding Partnership. We promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.

We understand the importance of recording low-level concerns and the actions taken in light of these being reported and follow the Trust guidance for safeguarding concerns against an adult. The records are kept confidential and stored securely, in

line with the Trust guidance for safeguarding concerns against an adult. We will review the records we hold to identify potential patterns and act where appropriate. This could be through a disciplinary process but also by referring to the Local Safeguarding Partnership LADO.

Where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Norfolk/Suffolk directly and in line with Trust guidance for safeguarding concerns against an adult.

We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

STATUTORY FRAMEWORK

This policy has been devised in accordance with the following legislation and guidance:

- Working Together to Safeguard Children DfE (July 2023)
- Keeping Children Safe in Education DfE (2025)
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (Feb 2022)

ANNEX 1 – TYPES OF ABUSE

This annex should be read in conjunction with Annex B of Keeping Children Safe in Education (2025).

The four main types of abuse referred to in Keeping Children Safe in Education (2025), and a summary of their definitions, are:

Physical abuse

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

Emotional abuse

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

Sexual abuse

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

Neglect abuse

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Contextual safeguarding/Extra-Familial Harm

We recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school or home environment and/or can occur between children outside of the school. This is known as contextual safeguarding. It is key that all school staff are aware of the definition of contextual safeguarding/extra-familial harm and consider whether children are at risk of abuse or exploitation in situations outside their families.

When reporting concerns, staff should include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

We will work with local partners, including Social Care and Police, to ensure that we stay alert to any emerging contextual risks, and to ensure that assessment of risk for any of our pupils includes appropriate reference to their local community and environment.

Children who are Lesbian, Gay, Bi, Trans, Queer + (LGBTQ+)

We recognise that children who are, may be or are perceived to be a member of the LGBTQ+ community can be victims of abuse from their family and other children. All staff are trained to recognise the signs of abuse and must provide a safe space for children who are, may be or are perceived to be LGBTQ+ to speak about any concerns which they have. LGBTQ+ is included within our PSHE / RSE curriculums to counter act homophobic, biphobic and transphobic bullying, which will not be tolerated within our community.

Child Sexual Exploitation (CSE) Child Criminal Exploitation (CCE): County Lines and serious violence

We recognise that Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CSE and CCE can affect children, both male and female. Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online or through the use of technology.

We also note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however we are aware that girls are at risk of criminal exploitation too. We understand that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

We understand that County Lines represents drug networks or gangs that groom and exploit children and young people to carry drugs and money from one location to another. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs.

We know that there are indicators which may signal children are at risk from, or are involved with serious violent crime, including County Lines. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

So-called 'honour-based abuse (including Female Genital Mutilation and Forced Marriage

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA, they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (December 2015)

We recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties 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. The Forced Marriage Unit has [statutory guidance](#) and [Multi-agency guidelines](#) and can be contacted for advice or more information: Contact [020 7008 0151](tel:02070080151) or email fmu@fco.gov.uk. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are

not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional and can occur between partners and ex-partners. We understand that experiencing, hearing, and witnessing domestic abuse poses a significant risk to children and understand the detrimental impact experiences of this nature has on children, including the long-term impact on a child's physical and mental health and learning. Children who experience domestic abuse are recognised as victims in their own right within the law. It is also important to note that domestic abuse may occur between two children in their own intimate relationships.

Preventing radicalisation and extremism

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

- Through training, staff, volunteers, and Trustees understand what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise;
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies;
- The DSL has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism;
- The DSL will make referrals in accordance with Norfolk/Suffolk procedures and will represent our school at Channel meetings as required; and
- Through our curriculum, we will promote the spiritual, moral, social, and cultural development of pupils.

Child-on-child abuse

We recognise that children are also vulnerable to physical, sexual, and emotional abuse by their peers, another child, or siblings.

All staff are trained so that they are aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers;
- 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 nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery). We will refer to and apply the [UKCIS guidance](#) in circumstances where nudes and or semi nudes have been shared;-
- 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; and
- 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).

We understand that even if there are no reports of child-on-child abuse in our setting it does not mean it is not happening, it may be the case that it is just not being reported. We recognise that pupils may not find it easy to tell staff about their abuse and can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, and this may come from a friend or a conversation that is overheard.

Such abuse will always be taken as seriously, and the same safeguarding procedures will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating child-on-child abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Doing this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child-on-child abuse. The DSL will respond to any concerns related to child-on-child abuse in line with statutory guidance. We will ensure that all concerns, discussions, and decisions reached are clearly recorded and any identified actions are followed up.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. Victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. We will also offer appropriate support to the perpetrator and any other children involved.

Modern Slavery

We understand that modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We refer to the DfE guidance Modern slavery: How to identify and support victims for concerns of this nature.

Children who are absent from education

All staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

We adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are absent:

- An attendance register is taken at the start of the first session of each school day and once during the second session;
- We make every effort to contact parents and carers and follow up with the emergency contacts held;
- We hold at least two emergency contact numbers for each of the pupils on our roll wherever possible;
- Staff will alert DSLs to any concerns raised regarding children who are absent from school;
- The DSLs will meet regularly with the Attendance Lead, SENDCo and other members of the pastoral team to ensure that each response is thorough and considers all the relevant information about individual children;
- We will follow the procedures outlined in our attendance policy including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained absences; and
- When removing a child from roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements to prevent a student becoming a child missing from education.

Mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. It is key that staff are aware of how suffering abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour, and education. If any member of staff has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the safeguarding procedures as outlined in this policy.

There are clear systems and processes in place for identifying possible mental health problems and work with other agencies as required to respond to these concerns.

Children who need a Social Worker

We recognise that children who need a social worker may need this help due to abuse, neglect and complex family circumstances. Staff will be aware that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. The DSL will use information from the local authority to inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and promoting welfare. (For example, considering the provision of pastoral and/or academic support, alongside action by statutory services). The DSL will liaise with

relevant staff and outside agencies to monitor progress, achievement and to ensure that the child receives appropriate support.

Online Safety

Technology is a significant component in many safeguarding and wellbeing issues experienced by children. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse their peers online; this can take the form of abuse, harassment, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered. We will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Across all schools in the Trust we use Senso and FortiGate as our monitoring and filtering systems. These are in place to protect pupils while they are online on a school device, during school hours. These systems are routinely monitored by appropriate trained staff in school and will flag concerns when they are identified. The effectiveness of these systems is regularly reviewed by our staff to ensure they capture the current risks faced by children online. This information is used to inform a whole school approach to online safety.

We recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children face in our setting.

Parents have an important role to play in protecting their children from potential harm they may experience while online. We will routinely share resources and provide information to parents on these harms.

The Trustees will regularly monitor the effectiveness of our filtering and monitoring systems, using the DFE's Filtering and Monitoring standards as a benchmark. They will ensure all 'adults' at the school:

- Receive appropriate online safety training;
- Aware of and understand the systems used in school to monitor and filter the students use of technology;
- Manage them effectively, using the information to inform their whole school response to online safety; and
- Can articulate what action they taken when a concern is identified.

Cybercrime

At the Trust, we understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

If there are concerns about a child in this area, the Designated Safeguarding Lead will consider a referral to the Cyber Choices programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Children with special educational needs and disabilities or physical health issues

We recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges such as

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.

We work to address these additional challenges and consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

We also recognise that pupils who attend Alternative Provision will often have complex needs and due to this we are aware of the additional risk of harm these children may be vulnerable to.

Annex 2 - List of Designated Safeguarding Leads across Sapientia Education Trust

School	Designated Safeguarding Leads	Headteachers
Attleborough Academy	Michala Parks	Neil McShane
Attleborough Primary	Kate Faulkner	Fiona Milne
Beccles High School	Charlotte Goode	Chris Barns
Burston Primary School	Sally Underwood	Karen Millar
City Academy Norwich	James Lowden	Jo Franklin
Fakenham Academy	Steve Gray	Gavin Green
Felix Primary School	Helen Hockley	Leon Hall
Framingham Earl High School	Rachael Minister	Becky Arnold
Ghost Hill Infant School	Becky Westall	Becky Westall
Great Hockham Primary School	Lisa Hazard	Lisa Hazard
Ixworth High School	Georgina Burgess	Alistair Gibb
Old Buckenham High School	Andy Dwight	Paul Beale
Old Buckenham Primary School	Helen Mitchell	Helen Mitchell
Rockland St Mary Primary School	Vicky Bayliss	Hannah Boag
Rosecroft Primary	Jackie Drew	Jackie Drew
Seething and Mundham Primary School	Louise Thompson	Vicky McKenzie
Stradbroke High School	Karen Millar	Karen Millar
Surlingham Primary School	Vicky Bayliss	Hannah Boag
Tivetshall Primary School	Tom Henry	Karen Millar
White House Farm Primary School	Vicky Land	Lisa Cannell
Wymondham College	Julie Marsh	Emma Arrand
Wymondham College Prep School	Jon Timmins	Simon Underhill