



Horizons Specialist Academy Trust
Providing infinite opportunities

Horizons Specialist Academy Trust

Child Protection Policy, Procedures and Guidance

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Responsible Officer: Trust Safeguarding Lead

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Statement of intent

Horizons Specialist Academy Trust is committed to safeguarding and promoting the welfare, both physical and emotional, of every pupil both inside and outside of the Trust premises. We implement a trust wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Teaching pupils through the curriculum what safeguarding means, how to keep safe and recognise behaviour that is unacceptable, including online. Pupils are taught to recognise when they are at risk and how to get help when they need it.
- Identifying and making provision for any pupil that has been subject to abuse.
- Ensuring that members of the Board of Trustees, Principals and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns to the DSL/DDSL.
- Ensuring that the Principals and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Children, young people, and adults collaborate to develop a school community and a culture of vigilance, based on equality, dignity, respect, non-discrimination, and participation through the UNCRC.

All Staff have a responsibility to recognise child abuse, neglect and child on child abuse in its many forms and must have an understanding that 'it could happen here'. Staff should share any concerns they have about a child with the Designated Safeguarding Lead (DSL) or deputy (DDSL). However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL or DDSL.

Staff should have read and confirmed that they understand the Trust's Child Protection policy and Keeping Children Safe in Education Part 1. In the event of any safeguarding concerns being identified, information should be shared directly with the DSL or DDSL immediately. Failure to adhere to Horizons Specialist Academy Trust's Child Protection Policy, Procedures and Guidance will result in disciplinary action.

This policy applies to Horizons Specialist Academy Trust whole workforce and volunteers.

1. Definitions

1.1 The terms “**children**” and “**child**” refer to anyone under the age of 18.

1.2 For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children’s mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

1.3 For the purposes of this policy, the term “**harmful sexual behaviour**” includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

1.4 In accordance with Keeping Children Safe in Education (2024) and for the purposes of this policy, the term “**sexual harassment**” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

1.5 For the purpose of this policy, the term “**sexual violence**” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

1.6 The term “**teaching role**” is defined as planning and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Principal or Chief Executive to provide such direction and supervision.

2. Legal framework

2.1 This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

Legislation

- Children Act 1989 & 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers’ Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- General Data Protection Regulation (GDPR)

- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- The Equality Act 2010

Statutory Guidance

- HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2023) 'Working Together to Safeguard Children'
- HM Government (2023) 'Prevent duty guidance'
- DfE (2024) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory Guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DoH (2019) 'reducing the need for restraint and restrictive intervention'
- UNCRC (1990) 'Convention on the rights of the child'
- Safer Recruitment Consortium (2022) 'Guidance for Safer Working Practices'
- DfE (2024) 'Information sharing: advice for practitioners providing safeguarding services'

2.2 Other relevant Trust policies include:

- E-Safety Policy
- Behaviour Policy
- Staff Code of Conduct
- Data Protection Policy
- Whistleblowing Policy
- Safer Recruitment Policy

3. Roles and responsibilities

3.1 The Board of Trustees have a duty to:

- Ensure that the Trust complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the Trust are effective and comply with the law at all times.
- Guarantee that the Trust contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children' (2023).
- Confirm that the Trust's safeguarding arrangements take into account the procedures and practices of the relevant LA's as part of the inter-agency safeguarding procedures.

- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that a member of the board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Principal or another Trustee.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a member of staff from each Academy's SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Make sure that pupils are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure the Trust has appropriate filters and monitoring systems in place.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.

- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils. Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the pupil's legal status, contact details and care arrangements.
Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Ensure that the board of Trustees are aware of the changes from Local Safeguarding Children Board's to Safeguarding Partner arrangements and the need for the school/college to understand their role in effective multi-agency working under the new arrangements.
- Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Training should be updated regularly.

3.2 Academy Principals have a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by Trustees, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Ensure that staff, upon induction, are provided with the Safeguarding Policy, Staff Code of Conduct, part one of the 'Keeping children safe in education' (KCSIE) guidance, Behaviour Policy, online safety training, and the identity of the DSL and any deputies.

3.3 Academy Designated Safeguarding Leads and Deputy Safeguarding Leads have a duty to:

- Understand, and keep up-to-date with the new multi-agency arrangement of three safeguarding partners.
- Act as the main point of contact for the three safeguarding partners.
- Refer all cases of suspected abuse to children's social care services (CSC), the LA designated officer (LADO) for concerns around staff conduct, and the police in cases where a crime has been committed.
- Refer cases of radicalisation to the Channel panel.
Liaise with the Principal to inform them of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Be aware of pupils who have a social worker.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Understand the assessment process for providing early help and intervention.
- Support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate.
- Keep cases of early help under constant review and refer them to the CSC if the situation does not appear to be improving.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the Trust's Safeguarding Policies and procedures – this will be discussed during the staff induction process.
Be alert to the specific requirements of children in need, including those with SEND and young carers.
- Keep detailed, accurate and secure records of concerns and referrals.
- Secure access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the governing board to ensure the Trust's Child Protection Policy is reviewed annually and the procedures are updated regularly.
- Ensure the Trust's Child Protection Policy is available publicly, and parents are aware that the Academy's may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.
- Ensure that a pupil's child protection file is transferred to their new educational provision.
- Be available at all times during school hours to discuss any safeguarding concerns.
- Hold the details of the LA personal advisor and liaise with them as necessary.

- The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

At Horizons Specialist Academy Trust this means;

Horizons Specialist Academy Trust has a nominated Safeguarding Trustee, who works alongside the Chief Executive Officer, Deputy Chief Executive Officer, The Trust's Safeguarding & LAC Team and Designated Safeguarding Leads across the Trust.

Horizons Specialist Academy Trust Safeguarding team also provides a report to the Board of Trustees on a termly basis, which evidences, through supporting documentation, the implementation of the Child Protection Policy in the course of the year. Documents covering safeguarding referrals, CPOMS reports and outcomes, and any additional relevant information are presented.

Horizons Specialist Academy Trust have appointed the following Designated Safeguarding Leads. These people have the overall responsibility for safeguarding and Child Protection, have the appropriate authority and training to undertake such a role and are able to provide advice and support to other staff on child welfare and child protection matters. These people are able to take part in strategy discussions and inter agency meetings and to support other trained staff to do so as well as contribute to the assessment of children.

Horizons Specialist Academy Trust's Operational Designated Safeguarding Leads are:

- Trust Wide: Carly Beecroft (SPOC)
- Abbey Hill Academy: James Newman
- Abbey Hill 6th Form: Kathryn Thompson
- Archway Academy: Leigh Beaumont
- Green Gates Academy: Melanie Lyons
- Hollis Academy: Karl Fenton
- Mo Mowlam Academy: Rachel Glover
- The Meadows Academy: Andrew McGarry/Lucy Winter
- Westlands Academy: Stephen Thomas
- Woodlands Academy: Michelle Hockham

Horizons Specialist Academy Trust have appointed the following Deputy Designated Leads. These individuals are trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate LEAD RESPONSIBILITY for child protection will not be delegated and remains with the Designated Safeguarding Lead.

Horizons Specialist Academy Trust's Deputy Designated Safeguarding Leads are:

- Abbey Hill Academy: Joanna McDonagh, Sarah O'Donnell, Melissa Fisher, Bill Dingwall, Angela Nottingham
- Abbey Hill 6th Form: Paul Barton, Steve Cropper, Emma Darling
- Archway Academy: Martyn Steel-Brewster, Joanne Percival
- Green Gates Academy: Bryony McAnelly, Jemma Cruces
- Hollis Academy: Tom Maitland, Jean Neale, Katherine Hinman
- Mo Mowlam Academy: Mandy Southwick, Claire Naisbitt, Shamila Ali, Leanne Crean
- The Meadows Academy: Tom Wakelam, Sarah Straughan, Anne-Marie Roy
- Westlands Academy: Andrew Murphy, Jan Leonard, Lauren Wells
- Woodlands Academy: Jo Hampshire, Rachel Loftus, Mark Oliver

Horizons Specialist Academy Trust have also appointed the following Designated Teachers who are responsible for promoting the educational achievement of Children in Our Care (CIOC)/Looked After Children and previously Looked After Children,

- Abbey Hill Academy: Bill Dingwall
- Abbey Hill 6th Form: Steve Cropper
- Archway Academy: Ross Waterson
- Green Gates Academy: Bryony McAnelly
- Hollis Academy: Lucy Winter
- Mo Mowlam Academy: Rachel Glover
- The Meadows Academy: Lucy Winter/Andrew McGarry
- Westlands Academy: Andrew Murphy
- Woodlands Academy: Rachel Loftus

All staff members have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which pupils can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Ensure that they listen to and reflect on the voice of the child at ALL times and take seriously any concerns raised to them by a child.
- Ensure that they report ANY concerns of harm to any child to the Designated Safeguarding Lead or Deputy immediately. However, ALL staff can refer their concerns directly to the CSC (Children's Hub/MACH/MAST/First Contact) if necessary and the police in the stated incidents above. They should inform the Designated Safeguarding Lead or Deputy as soon as possible if they have reported concerns directly.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Ensure that there is mandatory reporting to the police in all cases where teachers discover that an act of FGM appears to have been carried out.
- Ensure that they attend regular formal training/updates at least annually to support them in recognising the signs and symptoms of abuse, particularly in support of early identification of needs of children to prevent an escalation of need or risk to the child.
- Ensure that they feel able to raise concerns about poor or unsafe practices of staff and potential failures in the school's safeguarding regime through whistleblowing procedures and the staff behaviour/code of conduct policy.
- Ensure that they understand through online safety training the additional risks for pupils online and continue to promote the school's E-Safety Policy in the protection of all pupils. Ensure that they understand their safeguarding responsibilities in relation to the Filtering and Monitoring systems in place across the Trust. This also includes the monitoring of 3G, 4G and 5G internet access via children's own mobile phones or electronic devices that can allow them unlimited access to the internet without any restrictions using their own data allowance. It should be clear in every school's online safety policy, the expectations of pupils regarding their own devices whilst on school site and the consequences of any evidence of inappropriate use of the internet.
- Ensure that they remain vigilant whilst visitors are on site and continue to promote the school's commitment to keeping children safe through reminding visitors and parents of the school's appropriate use of personal mobile phones/devices whilst they are on school premises. This includes staff understanding and adhering to the Staff code of conduct inclusive of use of mobile phones and electronic devices.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSL or Deputy DSL.

- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Follow the school's procedure for, and approach to, preventing radicalisation.
- Challenge senior leaders over any safeguarding concerns, where necessary.

4. Inter-agency working

- 4.1** Horizons Specialist Academy Trust contributes to inter-agency working as part of its statutory duty.
- 4.2** Horizons Specialist Academy Trust is aware of their expectations to fully support the system of three safeguarding partners.
- 4.3** Horizons Specialist Academy Trust will work with CSC, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.
- 4.4** Where a need for assessment is identified, Horizons Specialist Academy Trust will allow access for CSC from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
- 4.5** Horizons Specialist Academy Trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.
- 4.6** At Horizons Specialist Academy Trust, we recognise that when a child has a social worker, it is an indicator that the child may be more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.
- 4.7** Considering 4.3, staff members are aware that whilst the GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.
- 4.8** Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils.
- 4.9** If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.
- 4.10** Horizons Specialist Academy Trust also recognises the particular importance of interagency working in identifying and preventing child sexual exploitation (CSE) and child criminal exploitation (CCE).

5. Abuse and neglect

- 5.1** All members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.

- 5.2** All staff members will be aware of the indicators of abuse and the appropriate action to take following a pupil being identified as at potential risk of abuse or neglect.
- 5.3** When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following (further advice on indicators can be found in DfE 'Keeping Children Safe in Education'):
- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
 - Lack of concentration and acting withdrawn
 - Knowledge ahead of their age, e.g. sexual knowledge.
 - Use of explicit language
 - Fear of abandonment
 - Depression and low self-esteem.
- 5.4** All members of staff will be aware of the indicators of child-on-child abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.
- 5.5** All staff will be aware of the necessary procedures to follow to prevent child-on-child abuse.
- 5.6** All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put pupils in danger.
- 5.7** Staff members will be aware of the effects of a pupil witnessing an incident of abuse, such as witnessing domestic violence at home.
- 5.8** All staff are aware that 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. Staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy. Horizons Trust have appointed Senior Mental Health Leads within each Academy.

6. Types of abuse and neglect

- 6.1 Abuse:** A form of maltreatment of a child, which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
- 6.2 Physical abuse:** A form of abuse, which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.
- 6.3 Emotional abuse:** A form of abuse, which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

6.4 Sexual abuse: A form of abuse, which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.

6.5 Neglect: A form of abuse, which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

7. FGM

7.1 For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

7.2 FGM is considered a form of abuse in the UK and is illegal.

7.3 All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.

7.4 Teaching staff are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

7.5 There are a range of potential indicators that a pupil may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the pupil.

7.6 Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

7.7 Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

7.8 Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'Become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk

- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent
- 7.9** Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.
- 7.10** Indicators that FGM may have already taken place include the following:
- Difficulty walking, sitting or standing
 - Spending longer than normal in the bathroom or toilet
 - Spending long periods of time away from a classroom during the day with bladder or menstrual problems
 - Prolonged or repeated absences from school followed by withdrawal or depression
 - Reluctance to undergo normal medical examinations
 - Asking for help, but not being explicit about the problem due to embarrassment or fear
- 7.11** Whilst **all** staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. Further advice on how to do this can be found at: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>
- 7.12** FGM is also included in the definition of ‘honour-based’ Abuse (HBA), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.
- 7.13** All forms of HBA are forms of abuse and will be treated and escalated as such.
- 7.14** Staff will be alert to the signs of HBA; including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL/DDSL who will activate local safeguarding procedures if concerns arise.

8. Forced marriage and/or Honour-based Abuse

- 8.1** For the purpose of this policy, a “forced marriage” is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Forced marriage is classed as a crime in the UK.
- 8.2** So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead or Deputy as a matter of urgency.

As part of HBA, staff will also be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation
- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early

8.3 If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL/DDSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit.

8.4 The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Any concerns that students may be getting married should be referred to the DSL/DDSL.

9. Child sexual exploitation (CSE)

9.1 For the purpose of this policy, “child sexual exploitation” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator

9.2 CSE does not always involve physical contact, as it can also occur through the use of technology. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

9.3 Horizons Specialist Academy Trust have adopted the following procedure for handling cases of CSE, as outlined by the DfE:

Identifying cases

9.4 Trust staff members are aware of and look for the key indicators of CSE; these can include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;

- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited.

Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Referring cases

9.5 Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL/DDSL.

If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

Support

9.6 The LA and all other necessary authorities will then handle the matter to conclusion. Horizons Specialist Academy Trust will cooperate as needed.

10. Homelessness

10.1 The DSL and deputy(s) and Trust Parent Support Advisors will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

10.2 Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

10.3 Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm.

10.4 For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSC will be made as necessary where concerns are raised.

11. County lines and Child Criminal Exploitation

11.1 For the purpose of this policy:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Child Criminal Exploitation (CCE), is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

11.2 Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

11.3 Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL/DDSL.

11.4 The DSL/DDSL will consider referral to the National Referral Mechanism on a case-by-case basis.

11.5 Indicators that a pupil may be involved in county lines activity and/or CCE include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls

- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern
- Associate with other young people involved in exploitation
- Suffer from changes in emotional well-being
- Misuse of drugs and alcohol
- Regularly miss school or education or do not take part in education.

11.6 All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. 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.

11.7 All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

12. Domestic Abuse

The definition of Domestic Abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners of family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual or financial and emotional abuse. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse, or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Operation Encompass:

Operation Encompass is a police and school early intervention safeguarding information sharing partnership which supports children experiencing domestic violence and abuse.

All Trust Academies work in partnership with Police as part of Operation Encompass. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

13. Pupils with family members in prison

13.1 Pupils with a family member in prison will be offered pastoral support as necessary.

13.2 They will receive a copy of 'Are you a young person with a family member in prison' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

14. Pupils required to give evidence in court

14.1 Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed will be offered appropriate pastoral support.

14.2 Pupils in our Primary Academies will also be provided with the booklet '[Going to Court](#)' from HM Courts and Tribunals Service (HMCTS), where appropriate and allowed the opportunity to discuss questions and concerns.

14.3 Pupils in our Secondary Academies will also be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

15. Contextual safeguarding

15.1 Safeguarding incidents can occur outside of the Trust and can be associated with outside factors. Trust staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

15.2 Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

15.3 The Trust will provide as much contextual information as possible when making referrals to CSC.

16. A child absent from education

(To be read in conjunction with Horizons Specialist Academy Trust's Attendance Policy)

- 16.1** Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Horizons Specialist Academy Trust understand that a timely response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.
- 16.2** Staff will monitor pupils that are absent from the school, particularly on repeat occasions, and report them to the DSL/DDSL following normal safeguarding procedures, in accordance with the relevant Academy's Local Authority Children Missing Education Procedures.
- 16.3** The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

- 16.4** Pupils are placed on the admissions register at the beginning of the first day that is agreed by Horizons Specialist Academy Trust, or when the Academy has been notified that the pupil will first be attending.
- 16.5** The Academy will notify the LA within five days of when a pupil's name is added to the admissions register.
- 16.6** The Academy will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.
- 16.7** Two emergency contact details will be held for each pupil where possible.
- 16.8** Staff will monitor pupils who do not attend the Academy on the agreed date and will notify the LA at the earliest opportunity.
- 16.9** If a parent notifies the Academy that their child will live at a different address, the school will record the following information on the admissions register:
The full name of the parent with whom the pupil will live
- The new address
 - The date from when the pupil will live at that address
- 16.10** If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
- The name of the new school
 - The date on which the pupil first attended, or is due to attend, that school

16.11 Where a pupil moves to a new school, the Academy will use a secure internet system to securely transfer pupils' data.

16.12 To ensure accurate data is collected to allow effective safeguarding, Horizons Specialist Academy Trust liaise with the LA regarding any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

16.13 Horizons Specialist Academy Trust will only remove a pupil from the admissions register where advice has been sought from the LA and CME procedures have been followed.

16.14 If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

16.15 Horizons Specialist Academy Trust will work with the LA to establish methods of making returns for pupils back into the school.

16.16 Horizons Specialist Academy Trust will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

16.17 Horizons Specialist Academy Trust will also highlight any other necessary contextual information including safeguarding concerns

17 Pupils with SEND

17.1 Horizons Specialist Academy Trust recognises that, statistically, children and young people with disabilities and/or behavioural difficulties and disabilities are the most vulnerable to abuse. Trust staff who work, in any capacity, with children and young people with profound and multiple disabilities, sensory impairment, certain health conditions and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse. Trust staff must give consideration to children and young people who are subject to a statement of special needs, an education health and care plan or have a medical condition, as these can mask safeguarding issues and must not be dismissed

17.2 Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

17.3 When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

18. Alternative provision

18.1 Horizons Specialist Academy Trust will remain responsible for a pupil's welfare during their time at an alternative provider.

18.2 When placing a pupil with an alternative provider, the Trust will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

19. Work experience

19.1 When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.

20. Private fostering

20.1 When Horizons Specialist Academy Trust becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

21. Concerns about a pupil

21.1 If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy.

- 21.2** All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in section 28 of this policy.
- 21.3** Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter.
- 21.4** If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.
- 21.5** The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.
- 21.6** DSL/DDSL are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil.
- 21.7** If the situation does not improve after a referral, the DSL/DDSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.
- 21.8** If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered.
- 21.9** All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded by the DSL/DDSL and kept securely.
- 21.10** If a pupil is in immediate danger, a referral will be made to CSC and/or the police immediately.
- 21.11** If a pupil has committed a crime, such as sexual violence, the police will be notified.
- 21.12** Where there are safeguarding concerns, Horizons Specialist Academy Trust will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.
- 21.13** When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.
- 21.14** A multi-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.
- 21.15** It is the Trust's expectation that all staff must be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated

safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

22. Early help

22.1 Early help means providing support as soon as a problem emerges, at any point in a child's life.

22.2 Any pupil may benefit from early help, but in particular staff will be alert to the potential need for early help for pupils who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

22.3 Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

22.4 All staff will be made aware of the local early help process and understand their role in it.

22.5 Horizons Specialist Academy Trust's Parent Support Advisors, in liaison with Academy DSLs/DDSLs, will take the lead where early help is appropriate.

23. Managing referrals

23.1 The reporting and referral process outlined in Appendix A will be followed accordingly.

23.2 All staff members, in particular the Trust's DSL, will be aware of the LA's arrangements in place for managing referrals. The Trust's DSL will provide staff members with clarity and support where needed.

23.3 When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

- 23.4** The Trust's DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.
- 23.5** The Trust's DSL will work closely with the police to obtain help and support as necessary.
- 23.6** Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.
- 23.7** Horizons Specialist Academy Trust will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSC.
- 23.8** Where CSC decide that a statutory investigation is not appropriate, Horizons Specialist Academy Trust will consider referring the incident again if it is believed that the pupil is at risk of harm.
- 23.9** Where CSC decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.
- 23.10** At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so.
- 23.11** Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm.
- 23.12** Horizons Specialist Academy Trust will work closely with parents to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in school interventions, are effectively supported and know where they can access additional support.

24. Concerns about staff members and safeguarding practices

(To be read alongside of Horizons Specialist Academy Trust Whistleblowing Policy, Staff Handbook and Code of Conduct)

- 24.1** If any staff member (including supply staff/volunteers/agency/Trustees or Governors) has concerns about any adult working across the Trust (including Trustees, Governors, volunteers, supply teachers and agency staff) it will be raised with the Academy Principal or DSL.
- 24.2** If the concern is with regards to the Principal, Trust Leaders or Executive Leaders, it will be referred to the CEO.
- 24.3** If the concern is with regards to the CEO, it will be referred to the Chair of Trustees.
- 24.4** Any concerns regarding the safeguarding practices within the Trust will be raised with the Principals and the necessary whistleblowing procedures will be followed, as outlined in the Trust's Whistleblowing Policy. The Whistleblowing policy provides guidance to

staff, volunteers and contractors on how they can raise concerns and receive appropriate feedback on action taken.

24.5 If a staff member feels unable to raise an issue with the Principal/Chair of Trustees they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

24.6 Any allegations of abuse made against staff members will be dealt with in accordance with the Local Procedures.

24.7 Should the Trust receive an allegation relating to an incident that happened when an individual or organisation was using Trust premises running activities for children, they should follow the Trust safeguarding policies and procedures, including informing the LADO.

25. Dealing with allegations of abuse against staff

25.1 All allegations will be dealt with in line with the Local procedures

(Teeswide) [18. Managing Allegations Against Those who Work or Volunteers with Children - Tees Safeguarding Children Partnerships' Procedures \(teescpp.org.uk\)](#)

(North Yorkshire) [NYSCP \(safeguardingchildren.co.uk\)](#)

(Durham) [Allegations Against Staff or Volunteers](#)

And Part 4 of [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](#)

25.2 The guidance in KCSIE (Part 4) should be followed where it is alleged that anyone working in the school or college that provides education for children under the age of 18 years of age, including supply teachers and volunteers has:

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

25.3 Where an allegation is substantiated, and the individual is dismissed or resigns, the school will refer it to the Disclosure and Barring Service (DBS). They will also consider referring the matter to the Teaching Regulation Agency (TRA) for consideration for a prohibition order.

25.4 If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSC.

25.5 Horizons Specialist Academy Trust will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.

25.6 Low Level Concerns.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level

concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – this can include:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Where a concern does not meet the ‘harm’ threshold, all staff should continue to follow Trust reporting procedures detailed within section 24 of this policy and the whistle blowing policy. Low level concerns will be recorded using the Trust’s ‘low level concerns’ form, and will include details of the concern and the action taken.

26. Allegations of abuse against other pupils (child-on-child abuse)

Child-on-child abuse 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 children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, 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).

Sexual harassment

26.1 Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

26.2 Sexual harassment includes:

- Sexual comments.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against another pupil.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence

26.3 Sexual violence refers to the three following offences:

- **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

26.4 Harmful sexual behaviours

The term “harmful sexual behaviour” is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.

26.5 Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not).

A preventative approach

26.6 In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE, RSHE and PSD lessons.

26.7 Horizons Specialist Academy Trust will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE, RSHE and PSD lessons. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual harm and sexual harassment is always wrong
- Addressing cultures of sexual harassment

26.8 Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

Awareness

26.9 All staff will be aware that pupils of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”. All staff will also be aware that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

26.10 All staff will be aware that child-on-child abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.

26.11 All staff will be made aware of the heightened vulnerability of Horizons Specialist Academy Trust pupils, who, due to their SEND are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.

26.12 The fact that a pupil or student may be LGBTQ+ is not in itself an inherent risk factor for harm. However, LGBTQ+ children can be targeted by other children. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. At Horizons Specialist Academy Trust, it is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Horizons Specialist Academy Trust will refer to the Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

26.13 Horizons Specialist Academy Trust's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

26.14 Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

Support available if a child has been harmed, is in immediate danger or at risk of harm

26.15 If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSC.

26.16 Within one working day, a social worker will respond to the referrer to explain the action that will be taken. Support available if early help, section 17 and/or section 47 statutory assessments are appropriate

26.17 If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

26.18 Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSC. The DSL/DDSL will be aware of the local process for referrals to both CSC and the police.

26.19 Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

26.20 Horizons Specialist Academy Trust have a close relationship with the local police force and the DSL/DDSL will liaise closely with the local police presence.

Support available if reports include online behaviour

26.21 Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, including images created by Artificial Intelligence (AI), especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Online concerns can be especially complicated. Horizons Specialist Academy Trust recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

26.22 If the incident involves sexual images or videos held online, if appropriate, the Internet Watch Foundation will be consulted to have the material removed.

26.23 Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

26.24 Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

26.25 If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSC where necessary. If staff are in any doubt, they will speak to the DSL/DDSL.

26.26 Where an alleged incident took place away from the Trust or online but involved pupils from the Trust, the duty to safeguard pupils remains the same.

26.27 All staff will be aware of how to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
- Only recording the facts as the child presents them – not the opinions of the note taker.

- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCIS sexting advice ([‘Sharing Nudes and Semi Nudes’, March 2024](#)).
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.
- Reports of Sexual Violence or Sexual Harassment should include the time and location of the incident. Subsequent risk assessments should include any actions to make the location safer.

Confidentiality

26.28 Horizons Specialist Academy Trust will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the academy not to tell anyone about the disclosure, the academy cannot make this promise. Even without the victim’s consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

26.29 The DSL/DDSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSC.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

26.30 The DSL/DDSL will weigh the victim’s wishes against their duty to protect the victim and others. If a referral is made against the victim’s wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim.

Anonymity

26.31 There are legal requirements for anonymity where a case is progressing through the criminal justice system. Horizons Specialist Academy Trust will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

26.32 When deciding on the steps to take, the academy will consider the role of social media in potentially exposing victims’ identities and facilitating the spread of rumours.

Risk assessment

26.33 The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

26.34 Risk assessment will consider:

- The victim.
- The alleged perpetrator.
- Other children at the school, especially any actions that are appropriate to protect them.

26.35 Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy.

Taking action following a disclosure

26.36 The DSL or a deputy will decide the academy's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- Any related issues with regard to intra-familial harm and necessary support for siblings.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

26.37 Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

26.38 For reports of rape and assault by penetration, whilst the academy establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The academy will consider how to keep the victim and alleged perpetrator apart on Trust premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

26.39 For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

26.40 In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Managing the report

26.41 The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSC or the police, the DSL/DDSL will speak to the relevant agency to discuss informing the alleged perpetrator.

26.42 There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help
- Referring to CSC
- Reporting to the police

26.43 Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

26.44 The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Managing internally

26.45 In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing early help

26.46 Horizons Specialist Academy Trust may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual harm.

Referral to CSC

26.47 If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSC. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSC.

26.48 Horizons Specialist Academy Trust will not wait for the outcome of an investigation before protecting the victim and other children.

26.49 The DSL/DDSL will work closely with CSC to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

26.50 If CSC decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

26.51 If the school agrees with the decision made by CSC, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the police

26.52 Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSC. The DSL and deputies will follow the local process for referral.

26.53 Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the Trust to support the child with any decision they take, in unison with CSC and any appropriate specialist agencies.

26.54 The DSL and Trustees will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

26.55 The DSL/DDSL will be aware of local arrangements and specialist units that investigate child abuse.

26.56 In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

26.57 Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

26.58 The Trust will work with CSC and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

26.59 The term ‘released under investigation’ (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

26.60 Where bail is deemed necessary, the Trust will work with CSC and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

Managing delays in the criminal justice system

26.61 The Trust will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.

26.62 The DSL/DDSL will work closely with the police to ensure the academy does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

26.63 Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same academy as the victim, the academy will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.

26.64 The Trust will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

26.65 Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the Trust will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The Trust will discuss decisions with the victim and offer support.

26.66 The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

Ongoing support for the victim

26.67 Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the academy uses to describe the victim
- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

26.68 Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

26.69 Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

26.70 The academy will provide a physical space for victims to withdraw to.

26.71 Victims may require support for a long period of time and the academy will be prepared to offer long-term support in liaison with relevant agencies.

26.72 Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

26.73 If the victim is unable to remain in the academy, alternative provision or a move to another academy will be considered – this will only be considered at the request of the victim and following discussion with their parents.

26.74 If the victim does move to another school, the DSL/DDSL will inform the new school of any ongoing support needs and transfer the child protection file.

Ongoing support for the alleged perpetrator

26.75 When considering the support required for an alleged perpetrator, the Trust will take into account:

- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

26.76 When making a decision, advice will be taken from CSC, specialist sexual violence services and the police as appropriate.

26.77 If the alleged perpetrator moves to another school (for any reason), the DSL/DDSL will inform the destination school of any ongoing support needs and transfer the child protection file.

26.78 The Trust will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

26.79 Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the Trust reaching its own conclusion and imposing an appropriate penalty.

26.80 The Trust will make such decisions on a case-by-case basis, with the academy DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSC will be consulted where necessary.

26.81 The Trust will also consider whether circumstances make it unreasonable or irrational for the academy to make a decision about what happened while an investigation is considering the same facts.

26.82 Disciplinary action and support can take place at the same time.

26.83 The Trust will be clear whether action taken is disciplinary, supportive or both.

Shared classes

26.84 Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on academy premises and on school transport – balancing the Trust’s duty to educate against its duty to safeguard. The best interests of the pupil will always come first.

26.85 Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on academy premises and transport will be prevented.

26.86 Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the academy would harm the education or welfare of the victim and potentially other pupils.

26.87 Where a criminal investigation into sexual assault leads to a conviction or caution, the Trust will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the academy, the academy will keep the victim and perpetrator in separate classes and manage potential contact on academy premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

26.88 Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

26.89 In all cases, the Trust will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

26.90 In most sexual violence cases, the Trust will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

26.91 The Trust will meet the victim’s parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

26.92 The Trust will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made

available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Safeguarding other children

26.93 Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

26.94 It is likely that children will “take sides” following a report, and the Trust will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

26.95 The Trust will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

26.96 As part of the Academy’s risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. The Trust will consider any additional support that can be put in place.

27. Communication and confidentiality

To be read in conjunction with [‘Information sharing: advice for practitioners providing safeguarding services’](#) (DfE 2024)

27.1 All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with Horizons Specialist Academy Trust data protection policies.

27.2 Where there is an allegation or incident of sexual abuse or harm, the victim is entitled to anonymity by law; therefore, the Trust will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.

27.3 Where a report of sexual harm or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

27.4 Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

27.5 During disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

27.6 Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim’s consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.

27.7 Before doing so, the DSL/DDSL will weigh the victim’s wishes against their duty to protect the victim and others.

- 27.8** Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.
- 27.9** Depending on the nature of a concern, the DSL/DDSL will discuss the concern with the parents of the pupils involved.
- 27.10** Discussions with parents will not take place where they could potentially put a pupil at risk of harm.
- 27.11** Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.
- 27.12** Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed.
- 27.13** External agencies will be invited to these discussions where necessary.
- 27.14** Where confidentiality or anonymity has been breached, Horizons Specialist Academy Trust will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.
- 27.15** Where a pupil is leaving an academy, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, which will allow the new provider to support the pupil and arrange appropriate support for their arrival. This can include a transfer of the student's CPOMs chronology.

28. Online safety

(To be read in conjunction with Horizons Specialist Academy Trust E-Safety policy)

- 28.1** Pupils at Horizons Specialist Academy Trust are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age appropriate way. We are sensitive to the specific needs and vulnerabilities of individual pupils, including pupils who are victims of abuse and pupils with special educational needs or disabilities. The Trust adopt a whole school approach to online safety that considers the 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, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial and 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. Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

28.2 Through training, all staff members will be made aware of the following:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a pupil's online activity. This will include the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

28.3 Horizons Specialist Academy Trust will ensure that suitable filtering and monitoring systems are in place to prevent children accessing terrorist and extremist material, in accordance with the Trust's E-safety policy. Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include, physical monitoring, live software monitoring and monitoring individual devices. Systems are regularly reviewed for their effectiveness. The Trust Safeguarding Lead and IT Manager will take lead responsibility for understanding the filtering and monitoring systems and processes in place.

28.4 The use of mobile phones by staff and pupils is closely monitored by the Trust, in accordance with the Trust's E-safety policy and individual Academy Behaviour Guidance.

28.5 The Trust will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils can be taught regarding online teaching.

29. Mobile phone and camera safety

29.1 Staff members will not use personal mobile phones or cameras when pupils are present.

29.2 Staff may use mobile phones on school premises outside of working hours when no pupils are present.

29.3 Staff may use mobile phones in the staffroom during breaks and non-contact time.

29.4 Mobile phones will be safely stored and in silent mode whilst pupils are present.

29.5 Staff will use their professional judgement in emergency situations.

29.6 Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present.

29.7 The sending of inappropriate messages or images from mobile devices is strictly prohibited.

29.8 Horizons Specialist Academy Trust ICT Manager and Academy E-Safety leads will review and authorise any downloadable apps – no apps or programmes will be downloaded on to work devices without express permission from an ICT technician or E-safety leads.

- 29.9** Horizons Specialist Academy Trust will adhere to the terms of the E-Safety Policy at all times.
- 29.10** Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to Horizons Specialist Academy Trust's Data Protection Policy.
- 29.11** Academy DSL/DDSL will, in known cases of a pupil who is a Child in Care or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.
- 29.12** Staff will report any concerns about another staff member's use of mobile phones to the DSL/DDSL. Staff who do not adhere to this policy will face disciplinary action.

30. Sports clubs and extracurricular activities

- 30.1** Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the Trust to effectively safeguard pupils and adhere to local safeguarding arrangements.
- 30.2** Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of pupils.
- 30.3** Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the police, if necessary.
- 30.4** All national governing bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

31. Preventing Radicalisation

- 31.1** For the purpose of this policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies.
- 31.2** Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.
- 31.3** Horizons Specialist Academy Trust will actively assess the risk of pupils being drawn into terrorism.
- 31.4** Staff will be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection.
- 31.5** Staff will use their professional judgement to identify pupils who may be susceptible to radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.

31.6 Horizons Specialist Academy Trust will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

31.7 Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

Training

31.8 The Trust's Single Point of Contact will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The Single Point of Contact will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Risk indicators of vulnerable pupils

31.9 Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

31.10 Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

31.11 Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

31.12 Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:

- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

31.13 When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations? • Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others? • Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

31.14 Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.

- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

31.15 Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL/DDSL.

31.16 The Trust's Single Point of Contact will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel programme

31.17 Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable pupil is at risk of being involved in terrorist activities.

31.18 In cases where the Trust believes a pupil is potentially at serious risk of being radicalised, the Single Point of Contact, in liaison with Academy Principal, will contact the Channel programme.

31.19 The Trust's Single Point of Contact will also support any staff making referrals to the Channel programme.

31.20 The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

31.21 The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multiagency cooperation and support from the school.

31.22 The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSC, or where the individual is already known to CSC.

31.23 Horizons Specialist Academy Trust will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.

- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

31.24 Horizons Specialist Academy Trust will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- Police Single Point of Contact
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website

32. Safer Recruitment

32.1 An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

32.2 The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

Pre-employment checks

32.3 The governing board will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System.

- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that a professional regulating authority has imposed.
- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.
- Confirming that an individual taking up a management position is not subject to a section 128 direction.
- As part of the shortlisting process candidates will be informed that the Trust may carry out an online search as part of due diligence.

32.4 An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Internal candidates

32.5 If an individual moves from a position within the school that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out.

32.6 References from internal candidates will always be scrutinised before appointment.

ITT candidates

32.7 Where applicants for ITT are salaried by the school, the school will ensure that enhanced DBS checks with barred list information are carried out.

32.8 Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

Trustees

32.9 The trust requires enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Before an individual becomes a trustee, the school will carry out an enhanced DBS check and confirm their identity. Where a trustee also engages in regulated activity, a barred list check will also be requested. An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check. If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

Those who have lived or worked outside of the UK

32.10 For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that a professional regulating authority has imposed.

Barred list check

- 32.11** An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.
- 32.12** If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.
- 32.13** Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

- 32.14** References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.
- 32.15** References will only be accepted from a senior person and not from a colleague.
- 32.16** References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.
- 32.17** Open testimonials will not be considered.
- 32.18** Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.
- 32.19** Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

Volunteers

- 32.20** No volunteer will be left unsupervised with a pupil or allowed to work in regulated activity until the necessary checks have been obtained.
- 32.21** An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.
- 32.22** Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.
- 32.23** A supervised volunteer who regularly teaches or looks after children is not in regulated activity.
- 32.24** Horizons Specialist Academy Trust will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.
- 32.25** Unless there is cause for concern, Horizons Specialist Academy Trust will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

Contractors

- 32.26** Horizons Specialist Academy Trust will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

32.27 Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

32.28 Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the Academy.

Data retention

32.29 DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.

32.30 A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

Referral to the DBS

32.31 Horizons Specialist Academy Trust will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.

Ongoing suitability

32.32 Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

33. Single Central Record (SCR)

33.1 Horizons Specialist Academy Trust holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

33.2 The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

33.3 For agency and third-party supply staff, Horizons Specialist Academy Trust will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all of the necessary checks have been conducted and the date that confirmation was received.

33.4 If any checks have been conducted for volunteers, this will also be recorded on the SCR.

33.5 If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

34. Staff suitability

34.1 Horizons Specialist Academy Trust ensure that for our academies providing care for pupils under the age of eight, staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.

34.2 A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

34.3 All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment.

34.4 A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. Horizons Specialist Academy Trust will provide support with this process.

35. Training

35.1 Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated.

35.2 The induction training will cover:

- Horizons Specialist Academy Trust Child Protection Policy
- Horizons Specialist Academy Trust Behaviour Policy
- Horizons Specialist Academy Trust Staff Code of Conduct
- The safeguarding response to children who go missing or are absent from education
- The identity and role of Academy DSLs and any deputies

35.3 All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. This will include an appropriate understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring so it is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training.

- 35.4** Staff will receive opportunities to contribute towards and inform the safeguarding arrangements within the Trust.
- 35.5** Horizons Specialist Academy Trust DSLs and deputy DSLs will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up to date with any developments relevant to their role.
- 35.6** Online training will also be conducted for all staff members as part of the overall safeguarding approach.
- 35.7** All Trustees and Governors take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective' (Keeping Children Safe in Education, 2024, paragraph 81).

36. Monitoring and review

- 36.1** This policy is reviewed annually by Board of Trustees to ensure that updates arising as a result of changes to legislation and updates from the DfE are included.
- 36.2** The safeguarding reports presented to the Board of Trustees will provide evidence of the impact and effectiveness of the policy. These reports will be presented and evaluated termly.
- 36.3** Any changes made to this policy by the Safeguarding and EHA lead will be communicated to all members of staff.
- 36.4** All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.
- 36.5** The next scheduled review date for this policy is Autumn 2025.