

# Discovery Trust Safeguarding and Child Protection Policy 2026–2027

Applicable to all Discovery Trust schools from 1 September 2026

Discovery Trust is committed to safeguarding and promoting the welfare of every pupil across all Trust schools. Safeguarding is everyone’s responsibility and is embedded through a culture of vigilance, professional curiosity, timely action and child-centred practice. Our approach is underpinned by the Trust values of **Belonging, Ambition and Equity**, ensuring that every pupil is safe, known, listened to, supported and able to thrive.

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| <b>Policy title</b>        | Discovery Trust Safeguarding and Child Protection Policy 2026–2027                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <b>Review cycle</b>        | Annual, or sooner where statutory guidance, legislation, Trust requirements or local safeguarding arrangements change                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Next review date</b>    | September 2027                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Applicable to</b>       | All Discovery Trust schools, trustees, Advisory Board members, colleagues, volunteers, contractors, supply colleagues, visitors and partner organisations working with or on behalf of pupils                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>School addendum</b>     | The School Safeguarding Local Arrangements Addendum template is approved as part of this policy. Each school must complete and review its own local addendum at least annually.<br>Before implementation from 1 September 2026, each school must complete its School Safeguarding Local Arrangements Addendum and confirm that local safeguarding contacts, referral routes, LADO details, out-of-hours arrangements, filtering and monitoring arrangements, alternative provision arrangements and contextual safeguarding concerns are accurate, approved locally and shared with colleagues. |

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## 1. Introduction

This policy sets out Discovery Trust’s Trust-wide safeguarding and child protection expectations for all Trust schools. It confirms the statutory, governance and operational arrangements that ensure pupils are safeguarded consistently, concerns are acted on without delay, and trustees receive appropriate assurance that safeguarding practice is effective across the Trust.

## 2. Purpose, scope and application

This policy aims to:

- ensure appropriate action is taken promptly to safeguard and promote pupils’ welfare;
- make clear that safeguarding is everyone’s responsibility across the Trust;
- provide a consistent framework for identifying, recording, reporting and responding to safeguarding and child protection concerns;
- support early identification, family help / early help, child in need and effective work with statutory safeguarding partners;

ensure that allegations, low-level concerns, safer recruitment, online safety, attendance, alternative provision and vulnerable pupils are addressed through clear Trust-wide expectations; and  
confirm the matters that must be completed locally through each school's School Safeguarding Local Arrangements Addendum.

## **2.1 Scope**

This policy applies to all Discovery Trust schools and to all pupils on roll, including pupils educated on school premises, off site, online, through extended provision, during educational visits or through alternative provision arranged or commissioned by a school. It applies to safeguarding concerns arising inside or outside school, including online harm and harm within families, peer groups, communities and wider contexts.

This policy applies to trustees, Advisory Board members, Headteachers, Designated Safeguarding Leads, deputy DSLs, teachers, support colleagues, central team colleagues, volunteers, supply colleagues, agency workers, contractors, visitors, trainees and any organisation or individual working with or on behalf of Discovery Trust pupils.

## **2.2 Trust-wide policy and school addenda**

This policy is the central safeguarding and child protection policy for Discovery Trust. Individual schools must not maintain separate full safeguarding and child protection policies. Instead, each school must complete and review a short School Safeguarding Local Arrangements Addendum. The addendum records school-specific information such as DSL details, local authority routes, LADO contacts, family help / early help arrangements, contextual safeguarding concerns, filtering and monitoring arrangements, alternative provision arrangements and site-specific procedures. The School Safeguarding Local Arrangements Addendum must not replace or weaken this Trust policy. Where a local procedure is required, it must be consistent with this policy, statutory guidance and local multi-agency safeguarding arrangements. Headteachers and DSLs are responsible for ensuring that local arrangements are accurate, locally approved where required, visible to colleagues and reviewed at least annually.

## **3. Statutory framework and linked guidance**

This policy has been written with regard to the statutory framework and guidance in force for schools and multi-academy trusts in England from 1 September 2026, including Keeping Children Safe in Education 2026, which comes into force on that date. Discovery Trust will review this policy annually, and sooner where statutory guidance, legislation or local safeguarding arrangements change.

The Trust and its schools will have regard to the following statutory guidance, legislation and legal duties when implementing this policy:

**Keeping Children Safe in Education 2026**, which sets out the legal duties schools and colleges must follow to safeguard and promote the welfare of pupils under the age of 18, including Part one for all colleagues and the requirements for school and Trust safeguarding management.

**Working Together to Safeguard Children 2026**, which sets out multi-agency arrangements to help, support, protect and promote the welfare of children, including the role of education providers within local safeguarding systems and the move towards family help.

**The Children Act 1989 and Children Act 2004**, including duties relating to children in need, child protection enquiries, safeguarding partnerships and cooperation between agencies.

**Section 175 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014**, as they apply to academies and independent schools, including the duty to safeguard and promote pupils' welfare.

**The Equality Act 2010, the Public Sector Equality Duty and the Human Rights Act 1998**, including duties to prevent discrimination, advance equality of opportunity, make reasonable adjustments and protect pupils from harassment, violence, abuse and degrading treatment.

**The Counter-Terrorism and Security Act 2015 and Prevent duty guidance**, including duties to have due regard to the need to prevent people from being drawn into terrorism.

**The Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015**, including the mandatory reporting duty for teachers.

**The Safeguarding Vulnerable Groups Act 2006, the Rehabilitation of Offenders Act 1974 and associated safer recruitment, regulated activity, DBS and barring requirements.**

**UK GDPR, the Data Protection Act 2018 and statutory safeguarding information-sharing expectations.**

**The statutory framework for the Early Years Foundation Stage**, where relevant to Trust schools with early years provision.

Discovery Trust will also have regard to relevant Department for Education and government guidance, including guidance on allegations against adults, low-level concerns, safer recruitment, filtering and monitoring, online safety, attendance, children absent from education and children missing education, alternative provision, SEND and vulnerable pupils, mental health and behaviour, behaviour and exclusions, elective home education, information sharing, Prevent, sharing nudes and semi-nudes, and statutory relationships, sex and health education. Statutory guidance must be read alongside local multi-agency safeguarding arrangements. Each school's School Safeguarding Local Arrangements Addendum must identify the relevant local safeguarding partnership, children's social care referral routes, LADO contact details, family help / early help arrangements, Prevent / Channel routes and any additional local procedures required by the local authority or safeguarding partners.

#### **4. Safeguarding principles and culture**

Discovery Trust expects every school to maintain a strong safeguarding culture in which pupils are safe, known, listened to and supported. Safeguarding and promoting the welfare of pupils is everyone's responsibility. All colleagues must act in the best interests of pupils, maintain professional curiosity and respond without delay when they have a concern.

**Child-centred practice:** decisions and actions must be informed by the needs, wishes, feelings and lived experiences of pupils.

**It could happen here:** colleagues must remain alert to the possibility of abuse, neglect, exploitation, sexual violence, child-on-child abuse, online harm and harm outside the home, even where there are no reports.

**Early identification and help:** concerns must be noticed, recorded, reported and responded to at the earliest opportunity, including through family help / early help, child in need or statutory referral routes where appropriate.

**Professional curiosity:** colleagues must look beyond presenting behaviour, challenge assumptions and consider whether a pupil's behaviour, absence, injury, distress or communication may indicate unmet need or safeguarding concern.

**Belonging, Ambition and Equity:** safeguarding practice must be inclusive, anti-discriminatory and responsive to pupils' individual circumstances, including additional vulnerabilities linked to SEND, health needs, care experience, social care involvement, discrimination, family circumstances, exploitation or trauma.

**Respect and dignity:** pupils must be treated with compassion, taken seriously and protected from victim-blaming, shame, discrimination or retaliation.

**Shared accountability:** trustees, Advisory Boards, leaders, DSLs, colleagues, volunteers and partners must understand their safeguarding responsibilities and act within clear Trust-wide systems.

**Effective partnership:** schools must work constructively with parents and carers where appropriate, and with local authorities, safeguarding partners, police, health, family help / early help services, alternative provision providers and other agencies.

#### **4.1 Whole-Trust safeguarding culture**

Discovery Trust promotes a whole-Trust approach to safeguarding. Safeguarding is not limited to the work of DSLs; it must be embedded in leadership, governance, curriculum, pastoral care, attendance, behaviour, recruitment, site safety, digital systems, educational visits, extended provision, lettings and alternative provision.

All schools must create an environment in which pupils know how to seek help, colleagues know how to act, safeguarding information is recorded and shared appropriately, and leaders use safeguarding intelligence to identify patterns, safeguarding concerns and areas for improvement.

#### **4.2 Equality, inclusion and additional vulnerability**

Discovery Trust recognises that some pupils may be more vulnerable to harm, may experience additional barriers to disclosure, or may be at greater risk of being overlooked because of assumptions about behaviour, communication, disability, culture, family circumstances or previous experiences. Schools must actively reduce barriers to reporting and ensure that safeguarding practice is accessible, inclusive and responsive.

Safeguarding action must be fair, proportionate and free from discrimination. Colleagues must be alert to the impact of racism, prejudice, misogyny, homophobia, biphobia, transphobia, ableism, poverty, trauma and other forms of disadvantage or discrimination. Where pupils need reasonable adjustments, communication support or a trusted adult to help them share concerns, schools must provide this.

#### **4.3 Pupil voice, reporting and preventative education**

Pupils must be helped to understand what safe, respectful and healthy relationships look like, how to recognise safeguarding concerns, and how to seek help for themselves or others. Safeguarding themes must be taught through the curriculum, including relationships, sex and health education, online safety, behaviour, attendance, anti-bullying, equality, consent, exploitation, harmful sexual behaviour and personal safety.

Each school must promote clear, age-appropriate and accessible ways for pupils to report worries or concerns. Local reporting routes, including how pupils can speak to a trusted adult or use school-specific reporting systems, must be set out in the School Safeguarding Local Arrangements Addendum.

### **5. Trust-wide governance and accountability**

Discovery Trust is accountable for ensuring that safeguarding and child protection arrangements are effective, consistently implemented and subject to appropriate scrutiny across all Trust schools. Safeguarding governance operates through clear lines of responsibility from the Trust Board to executive leaders, school leaders, DSLs, Advisory Boards and all colleagues.

#### **5.1 Trust Board**

The Trust Board has strategic responsibility for safeguarding across Discovery Trust. Trustees must ensure that safeguarding and child protection are at the forefront of Trust culture, policy development, decision-making and assurance. The Trust Board approves this policy, receives safeguarding assurance, monitors the effectiveness of Trust-wide arrangements and ensures that statutory duties are met.



The Discovery Trust Board acts as the proprietor body for Trust schools for the purposes of statutory safeguarding guidance and retains ultimate strategic accountability for ensuring that safeguarding arrangements are effective, compliant and consistently implemented across all schools.

The Trust Board will ensure that:

there is a named trustee with strategic oversight of safeguarding;

Trust-wide safeguarding policies and procedures are effective, understood and reviewed at least annually;

schools have appropriate DSL capacity, training, supervision and support;

Trust leaders provide appropriate safeguarding leadership, challenge and assurance;

safer recruitment, single central record, allegations, low-level concerns, online safety, filtering and monitoring, attendance and alternative provision arrangements are subject to oversight;

all trustees and Advisory Board members receive safeguarding training appropriate to their role; and

safeguarding themes, risks, audits and assurance reports are considered through the Trust's governance structure.

## **5.2 Chief Executive Officer**

The CEO is responsible for ensuring that safeguarding is embedded across the Trust's executive leadership, operational systems and culture. The CEO ensures that the Trust Head of Safeguarding has appropriate status, access and authority to advise, challenge and support schools, and that serious safeguarding risks are escalated to trustees where required.

## **5.3 Trust Head of Safeguarding**

The Trust Head of Safeguarding provides strategic and operational safeguarding leadership across Discovery Trust. This includes policy development, statutory guidance analysis, advice and challenge to schools, safeguarding assurance visits, CPOMS quality assurance, DSL support and supervision, training oversight, escalation support and reporting to senior leaders and trustees.

## **5.4 Headteachers**

Headteachers are responsible for implementing this policy within their school. They must ensure that safeguarding is visible, understood and operationally effective; that the DSL and deputy DSLs have the time, training, resources and authority required; that all colleagues follow Trust procedures; and that the School Safeguarding Local Arrangements Addendum is accurate, reviewed annually and shared with colleagues. Headteachers must:

ensure all colleagues, volunteers, supply colleagues and regular visitors receive appropriate induction and safeguarding updates;

ensure concerns are recorded and responded to in line with this policy and local safeguarding partnership arrangements;

act as case manager for allegations against adults where appropriate, unless the allegation relates to them;

ensure low-level concerns are reported, recorded, reviewed and escalated where necessary;

maintain oversight of attendance, behaviour, online safety, filtering and monitoring, alternative provision and extended provision as safeguarding matters; and

escalate significant safeguarding concerns to the Trust Head of Safeguarding and, where appropriate, the Phase Director.

### **5.5 Designated Safeguarding Leads and deputy DSLs**

Each school must have a named DSL who is a member of the senior leadership team, supported by appropriately trained deputy DSLs. The DSL takes lead responsibility for safeguarding and child protection in the school, including online safety, filtering and monitoring knowledge, child protection referrals, multi-agency work, safeguarding records, pupil support, transfer of child protection files and advice to colleagues.

Deputy DSLs must be trained to the same standard as the DSL and must be able to provide effective cover. Local DSL and deputy DSL details, including cover and out-of-hours arrangements where relevant, must be recorded in the School Safeguarding Local Arrangements Addendum.

### **5.6 Advisory Boards**

Advisory Boards provide local support, scrutiny and challenge in relation to safeguarding implementation at school level. Each Advisory Board must identify a safeguarding link member who liaises with the Headteacher and DSL, understands local safeguarding strengths and contextual safeguarding concerns, and provides local assurance to the Trust's governance structure.

Advisory Boards do not approve separate full safeguarding policies. Their role is to support implementation of this Trust policy and review the school's School Safeguarding Local Arrangements Addendum so that local safeguarding contacts, contextual safeguarding concerns and procedures are accurate and understood.

### **5.7 All colleagues, volunteers and adults working with pupils**

All colleagues, volunteers, contractors, supply colleagues, agency workers, trainees and adults working with or on behalf of pupils must understand and follow this policy, the Staff Code of Conduct and the school's local safeguarding arrangements. They must read the required safeguarding information, attend training, remain alert to signs of harm, record and report concerns without delay, maintain appropriate professional boundaries and never assume that someone else will act.

### **5.8 Central team functions**

Central team functions, including HR, IT, estates, governance, attendance, SEND and school improvement, contribute to safeguarding through their professional roles. This includes safer recruitment, employment checks, managing allegations and low-level concerns, filtering and monitoring, site safety, contractors, data protection, records management, policy assurance, attendance oversight and support for vulnerable pupils.

### **5.9 Reporting, escalation and assurance**

Safeguarding concerns must be managed through clear reporting and escalation routes. School-level concerns are normally reported to the DSL or deputy DSL. Concerns about adults are reported in line with the allegations and low-level concerns sections of this policy. Significant, complex or unresolved safeguarding concerns must be escalated to the Trust Head of Safeguarding and, where appropriate, the Phase Director, CEO, safeguarding trustee, LADO, children's social care, police or other statutory partners.

Trust assurance will include safeguarding audits, school visits, DSL supervision, CPOMS quality assurance, single central record checks, policy review, training compliance monitoring, filtering and monitoring assurance, alternative provision checks, attendance oversight and reporting to the Trust's governance structure.

## **6. Roles and responsibilities**

This section sets out the practical responsibilities that support the governance arrangements in Section 5. These responsibilities apply across all Discovery Trust schools and must be read alongside each school's School Safeguarding Local Arrangements Addendum.

### **6.1 All colleagues**

All colleagues must understand that safeguarding and child protection are part of their professional duties. They must read and follow this policy, Part one of Keeping Children Safe in Education, the Staff Code of Conduct, the school's local safeguarding arrangements and any role-specific safeguarding guidance relevant to their work.

All colleagues must:

- remain alert to indicators of abuse, neglect, exploitation and wider safeguarding concerns;
- listen carefully to pupils and take concerns seriously;
- record and report concerns to the DSL or deputy DSL without delay;
- act immediately where a pupil is at risk of significant harm or in immediate danger;
- never promise confidentiality to a pupil where safeguarding information must be shared;
- maintain professional boundaries and follow the Staff Code of Conduct;
- report allegations or low-level concerns about adults in line with this policy; and
- challenge poor or unsafe practice and escalate concerns where necessary.

### **6.2 Designated Safeguarding Lead and deputy DSLs**

The DSL has lead responsibility for safeguarding and child protection in the school. Deputy DSLs provide cover and support and must be trained to the same standard as the DSL. The DSL role must have appropriate status, authority, time, training, funding, resources and access to senior leaders.

The DSL must:

- advise and support colleagues on safeguarding concerns and referrals;
- make or support referrals to children's social care, police, Channel or other statutory partners where required;
- lead and coordinate family help / early help, child in need, child protection and multi-agency work in school;
- maintain effective safeguarding records, chronologies and decision-making rationale;
- ensure safeguarding information is transferred securely when pupils move school;
- support pupils who are subject to child protection, child in need, family help / early help or other safeguarding plans;
- maintain oversight of online safety, filtering and monitoring concerns from a safeguarding perspective;
- work closely with attendance, SEND, pastoral, behaviour and curriculum leads;
- keep the Headteacher informed of significant safeguarding issues; and
- engage with Trust safeguarding assurance, supervision, audit and CPOMS quality assurance.

### **6.3 Headteachers**

Headteachers are responsible for ensuring that this policy is implemented effectively in their school. They must create conditions in which safeguarding practice is strong, visible and consistently understood.

Headteachers must:

- ensure the DSL and deputy DSLs have sufficient capacity, training and authority;
- ensure all colleagues receive safeguarding induction, training and updates;

ensure local safeguarding details are accurate in the School Safeguarding Local Arrangements Addendum;  
ensure concerns are recorded and acted on promptly;  
act as case manager for allegations against adults unless the allegation concerns them;  
ensure low-level concerns are managed, recorded and reviewed;  
ensure online safety, attendance, behaviour, extended provision, site safety and alternative provision are treated as safeguarding matters; and  
escalate significant safeguarding issues to the Trust Head of Safeguarding and CEO where required.

#### **6.4 Trust Head of Safeguarding**

The Trust Head of Safeguarding provides Trust-wide leadership, advice, challenge and assurance. This includes supporting schools with complex safeguarding matters, interpreting statutory guidance, developing Trust policy, leading safeguarding assurance activity, supporting DSL supervision, quality assuring CPOMS practice and reporting safeguarding strengths, risks and improvement priorities to senior leaders and trustees.

#### **6.5 Trustees and Advisory Board members**

Trustees must maintain strategic oversight of safeguarding and ensure this policy is implemented, monitored and reviewed across the Trust.

The safeguarding trustee must provide appropriate challenge and assurance through the Trust governance structure.

Advisory Board members must support local safeguarding scrutiny, understand the school's contextual safeguarding concerns and review the School Safeguarding Local Arrangements Addendum.

Advisory Board safeguarding link members should meet or communicate with the Headteacher and DSL as appropriate, focusing on local implementation, not individual case management.

Trustees and Advisory Board members must complete safeguarding training, including online safety, appropriate to their role.

#### **6.6 Designated teacher, SENCO and pastoral leaders**

The designated teacher for looked-after and previously looked-after pupils, SENCO, attendance lead, mental health lead and pastoral leaders must work closely with the DSL to identify and respond to safeguarding needs. This includes sharing relevant information, supporting pupils with additional vulnerabilities, contributing to plans and reviews, and ensuring that safeguarding concerns are not viewed in isolation from attendance, behaviour, SEND, mental health, care experience or family circumstances.

#### **6.7 Visitors, volunteers, contractors, supply colleagues and external providers**

Adults who work with or visit Discovery Trust schools must follow the school's safeguarding arrangements, visitor procedures and professional expectations. Schools must ensure appropriate checks, supervision and information are in place for volunteers, contractors, agency workers, supply colleagues, visitors, lettings users and external providers. Any concern about an adult must be reported in line with the allegations or low-level concerns sections of this policy.

### **7. Definitions and key safeguarding concepts**

For the purposes of this policy, safeguarding and promoting the welfare of pupils means protecting pupils from maltreatment, whether that is within or outside the home, including online; preventing impairment of pupils' mental and physical health or development; ensuring pupils

grow up in circumstances consistent with safe and effective care; and taking action to enable all pupils to have the best outcomes.

**Child protection:** part of safeguarding and refers to the activity undertaken to protect pupils who are suffering, or are likely to suffer, significant harm.

**Abuse:** a form of maltreatment of a pupil. Abuse may be caused by an adult or another child and may happen in person, online or through a combination of both.

**Neglect:** the persistent failure to meet a pupil's basic physical or emotional needs, likely to result in serious impairment of health or development.

**Exploitation:** where a pupil is coerced, controlled, manipulated or deceived for the benefit of another person or group, including criminal exploitation, sexual exploitation, trafficking, modern slavery or online exploitation.

**Significant harm:** harm that is sufficiently serious to require statutory child protection action, including harm caused by abuse, neglect, exploitation or cumulative concerns over time.

**Family help / early help:** support provided as soon as a need or concern emerges, at any point in a pupil's life, to prevent needs from escalating.

**Contextual safeguarding:** recognising that pupils may be harmed outside the family home, including in peer groups, schools, neighbourhoods, public spaces, transport, online environments and alternative provision.

**Child-on-child abuse:** abuse by one pupil or group of pupils against another pupil or group of pupils, including bullying, physical abuse, sexual violence, sexual harassment, harmful sexual behaviour, intimate relationship abuse, coercion, exploitation, online abuse and sharing nudes or semi-nudes.

**Sexual violence and sexual harassment:** forms of abuse that may occur in person or online, between pupils of any age and sex, and may be a single incident or part of a wider pattern of harmful behaviour.

**Online harm:** harm arising through technology, including harmful content, harmful contact, harmful conduct, online exploitation, grooming, cyberbullying, image-based abuse, misinformation, disinformation, radicalisation, financial exploitation and AI-enabled harm.

**Low-level concern:** any concern that an adult working in or on behalf of the Trust may have acted in a way that is inconsistent with the Staff Code of Conduct, including outside work, but does not appear to meet the harm threshold for an allegation.

**Allegation that may meet the harm threshold:** a concern that an adult may have harmed a pupil, may have committed a criminal offence against or related to a pupil, may pose a risk of harm to pupils, or may have behaved in a way that indicates they may not be suitable to work with pupils.

**Family help / early help, child in need and child protection:** levels of support and intervention that may be required depending on the nature, seriousness and persistence of concerns, and which must be considered through local multi-agency safeguarding arrangements.

**Information sharing:** the appropriate, proportionate and lawful sharing of safeguarding information where necessary to protect a pupil or promote their welfare. Safeguarding information must not be withheld where doing so would place a pupil at risk of harm or delay protective action.

**Professional challenge and escalation:** the responsibility to question, challenge and escalate where safeguarding concerns are not being addressed, where a referral is not accepted but the safeguarding concern remains unresolved, or where professional disagreement may affect pupil safety.

## 8. Key areas of safeguarding risk

**All colleagues must be able to recognise indicators of abuse, neglect, exploitation and wider safeguarding concerns.** Safeguarding issues rarely occur in isolation and may overlap. A pupil may

be at risk at home, in school, in the community, online, within peer groups, during off-site activity or in alternative provision.

The areas below are not exhaustive but set out key safeguarding themes to which colleagues must remain alert.

**Abuse, neglect and family harm:** physical, emotional and sexual abuse; neglect; domestic abuse, including where pupils see, hear or experience its effects at home; and so-called honour-based abuse, including female genital mutilation and forced marriage.

**Exploitation and contextual harm:** child sexual exploitation, child criminal exploitation, county lines, serious youth violence, gangs and organised criminal activity; modern slavery, trafficking, forced labour and financial exploitation; radicalisation, extremism and terrorism-related concerns.

**Child-on-child abuse and harmful behaviour:** child-on-child abuse, bullying, prejudice-based abuse, sexual violence, sexual harassment and harmful sexual behaviour.

**Online and technology-related harm:** grooming, harmful content, online bullying, image-based abuse, sharing nudes and semi-nudes, misinformation, disinformation, financial exploitation and AI-enabled harm.

**Health, wellbeing and risk-taking:** mental health concerns where these may indicate or increase safeguarding vulnerability; substance misuse, self-harm, suicidal ideation or risk-taking behaviour.

**Attendance and absence:** absence from education, persistent or unexplained absence, children missing education, missing from home or care, and reduced timetables.

**Off-site and site-related safeguarding:** alternative provision, managed moves, suspensions, exclusions, off-site activity, transport, extended provision, visitors, lettings and community use of school sites.

**Additional vulnerability and barriers to disclosure:** pupils affected by homelessness, private fostering, parental imprisonment, young caring responsibilities, bereavement or significant family stress; pupils with SEND, health needs or communication needs; pupils with a social worker, looked-after pupils, previously looked-after pupils and pupils previously known to children's social care.

**Discrimination and identity-based harm:** pupils affected by discrimination, racism, misogyny, homophobia, biphobia, transphobia, ableism or other forms of prejudice.

**Colleagues must not wait for certainty before acting.** Any concern, however small, must be recorded and reported to the DSL or deputy DSL without delay. Where a pupil is at immediate risk of harm, colleagues must take urgent action in line with the child protection procedures in this policy.

**Local contextual safeguarding concerns,** including community safety, transport, online trends, exploitation, local crime patterns and school-site arrangements, must be recorded in each school's School Safeguarding Local Arrangements Addendum.

## 9. Family help / early help, referrals and working with statutory partners

Discovery Trust expects concerns to be identified and acted on at the earliest opportunity. Family help / early help should be considered as soon as needs emerge, at any point in a pupil's life, to prevent concerns from escalating. Where a pupil may be suffering, or is likely to suffer, significant harm, this must not delay referral to children's social care or urgent action through the police.

### 9.1 Family help / early help

All colleagues must be alert to emerging needs, including changes in attendance, behaviour, presentation, wellbeing, family circumstances, peer relationships, online activity, SEND needs or known vulnerabilities. Concerns must be recorded and shared with the DSL or deputy DSL without

delay. The DSL will consider whether support can be provided through school pastoral systems, family help / early help, targeted services or a statutory referral.

Schools must follow the relevant local safeguarding partnership threshold document and local arrangements for family help / early help, child in need and child protection. School pastoral support must not be treated as a substitute for family help / early help, child in need support, child protection action, police involvement or referral to children's social care where statutory thresholds may be met or concerns are escalating.

### **9.2 Referrals to children's social care and police**

Where a pupil is suffering, or is likely to suffer, significant harm, the DSL or deputy DSL must make a referral to children's social care without delay. Where there is immediate danger, a risk to life or a possible criminal offence requiring urgent response, the police must be contacted immediately. If the DSL or deputy DSL is not available, this must not delay action. Any colleague may make a referral directly to children's social care or the police where necessary, but must inform the DSL or Headteacher as soon as possible afterwards.

Nothing in this policy prevents any colleague from contacting children's social care, police or emergency services directly where they believe a pupil is at immediate risk, where a referral is required urgently, or where the DSL or deputy DSL is unavailable. Colleagues must not delay urgent protective action while seeking internal permission.

### **9.3 Working with statutory partners**

Discovery Trust schools must work constructively with local safeguarding partners, children's social care, police, health, family help / early help services, virtual schools, youth justice, alternative provision providers and other relevant agencies. Schools must share information lawfully and proportionately where this is necessary to safeguard a pupil or promote their welfare. Each school's School Safeguarding Local Arrangements Addendum must identify local referral routes, family help / early help arrangements, children's social care contact details, out-of-hours arrangements, LADO details, Prevent / Channel routes and local escalation procedures.

### **9.4 Consent, parents and carers**

Where appropriate, schools should work in partnership with parents and carers and seek consent for family help / early help support. However, consent must not be sought, and information must not be shared with parents or carers, where doing so would place a pupil at increased risk of harm, compromise a police or social care investigation, or delay urgent safeguarding action.

The DSL will consider consent and information sharing in line with statutory guidance, local safeguarding partnership procedures and the Trust's data protection expectations. The welfare of the pupil is the paramount consideration.

### **9.5 Escalation and professional challenge**

If a referral is not accepted, if there is professional disagreement, or if the pupil's situation does not improve, the DSL must follow local escalation procedures and, where necessary, seek advice from the Trust Head of Safeguarding. Professional challenge must be recorded, including the concern, action taken, rationale, outcome and any further escalation.

## **10. Child protection procedures**

Discovery Trust expects every safeguarding or child protection concern to be taken seriously, recorded accurately and acted on without delay. Child protection procedures apply where a pupil may be suffering, or is likely to suffer, significant harm and must be followed alongside local multi-agency safeguarding arrangements.

### **10.1 What colleagues must do if they have a concern**

Colleagues must:

- act immediately and not assume someone else will take responsibility;
  - record the concern on CPOMS, or through the school's agreed interim process if CPOMS is unavailable;
  - report the concern to the DSL or deputy DSL without delay;
    - include clear factual information, the pupil's own words where relevant, dates, times, names, context and any action already taken;
  - avoid investigating, asking leading questions or seeking to prove whether abuse has occurred;
    - seek urgent help from the DSL, Headteacher, children's social care or police where immediate action is needed; and
  - follow up if they do not receive confirmation that appropriate action has been taken.
- [D:\undefined](#) Where a pupil may be at immediate risk of harm, colleagues may contact children's social care, police or emergency services directly and must not delay urgent action while seeking permission from the DSL, Headteacher or Trust leaders.

### **10.2 If a pupil makes a disclosure**

Colleagues must:

- listen calmly and allow the pupil to speak in their own words;
- reassure the pupil that they have done the right thing by telling someone;
  - not promise confidentiality or agree to keep secrets;
  - explain that information will only be shared with people who need to know to help keep them safe;
- do not ask leading or repeated questions, investigate, examine injuries or ask the pupil to write a statement;
- record the disclosure as soon as possible, using the pupil's own words where possible;
- report the disclosure to the DSL or deputy DSL immediately; and
- take urgent action if the pupil is in immediate danger or needs emergency medical attention.

### **10.3 Immediate danger or risk of significant harm**

Where a pupil is in immediate danger, has been seriously harmed, is at risk of removal from the country for abuse such as forced marriage or FGM, or urgent medical or police assistance is required, colleagues must take immediate protective action. This may include contacting emergency services, children's social care or the police directly. The DSL and Headteacher must be informed as soon as possible.

### **10.4 Role of the DSL in child protection concerns**

The DSL must:

- review the concern promptly and decide what action is required;
- consider the pupil's wishes and feelings, age, development, communication needs and any additional vulnerabilities;
- make referrals to children's social care, police, Channel or other statutory partners where required;
  - coordinate family help / early help, child in need or child protection activity where appropriate;
- ensure actions, decisions and rationale are recorded clearly;
  - keep the Headteacher informed of significant safeguarding matters, unless doing so would create a conflict or increase safeguarding risk;

work with parents and carers where appropriate and safe to do so;  
ensure pupils are supported while concerns are being assessed or investigated; and  
escalate or challenge where the response from another agency does not adequately address risk.

### **10.5 Parents, carers and confidentiality**

Schools should work in partnership with parents and carers where this is appropriate and safe. However, parents or carers must not be informed before advice is sought from the DSL, children's social care or police where doing so could place a pupil at increased risk, compromise an investigation, lead to evidence being destroyed, or delay urgent protective action.

### **10.6 Safeguarding records and follow-up**

All concerns, disclosures, referrals, decisions, professional discussions, outcomes and follow-up actions must be recorded clearly. Records must show what was known, what action was taken, who was involved, the rationale for decisions and whether the pupil remains at risk. Where a concern is significant, complex or ongoing, the DSL should ensure that the record includes an appropriate chronology and review of next steps.

### **10.7 Supporting pupils**

Schools must ensure that pupils affected by safeguarding concerns are supported in a way that is safe, proportionate and sensitive to their needs. This may include a trusted adult, adjustments to routines, pastoral support, attendance support, SEND support, mental health support, safety planning, curriculum support, liaison with parents or carers where appropriate, and coordinated work with statutory partners.

## **11. Recording and information sharing**

Accurate recording and appropriate information sharing are essential to effective safeguarding. Discovery Trust expects all safeguarding records to be timely, factual, proportionate, secure and capable of showing what was known, what action was taken, who was involved, the rationale for decisions and whether further action is required.

### **11.1 Recording concerns**

All colleagues must ensure that:

- all safeguarding concerns, disclosures, discussions, referrals, decisions, outcomes and follow-up actions are recorded in writing;
- records are made as soon as possible and normally on CPOMS, or through the school's agreed interim process if CPOMS is unavailable;
- records distinguish clearly between fact, professional judgement and third-party information; where a pupil's own words are relevant, they are recorded as accurately as possible;
- records include dates, times, names, context, actions taken, decisions reached, rationale and any further monitoring or escalation required; and
- if a colleague is unsure whether something should be recorded, they seek advice from the DSL or deputy DSL. If in doubt, record and report.

### **11.2 CPOMS and safeguarding files**

Discovery Trust schools use CPOMS as the primary safeguarding recording system. Access must be limited to colleagues with a legitimate safeguarding need and appropriate permissions. DSLs must ensure that CPOMS records are reviewed, actions are followed up, chronologies are maintained where needed, and patterns or repeated concerns are identified.

Where paper records, body maps, documents, professional notes or external agency correspondence are used, they must be uploaded, referenced or stored securely in line with Trust data protection and records retention arrangements. Confidential safeguarding information must be kept separately from general pupil records and accessed only by those with a professional need to know.

### **11.3 Information sharing**

Safeguarding information must be shared lawfully, proportionately and promptly where this is necessary to protect a pupil or promote their welfare. Data protection legislation does not prevent the sharing of information for safeguarding purposes. Colleagues must not allow uncertainty about information sharing to delay action where a pupil may be at risk.

Information should be shared with the DSL, deputy DSLs, Headteacher, Trust Head of Safeguarding, children's social care, police, health, family help / early help services, virtual school, alternative provision provider or other relevant agency where there is a safeguarding reason to do so.

Only information that is relevant and necessary should be shared, unless wider sharing is required to protect a pupil.

Where consent is appropriate, it should be sought; however, consent is not required where seeking it would place a pupil at increased risk of harm, prejudice a safeguarding investigation or delay urgent protective action.

Professional discussions and information-sharing decisions must be recorded, including who information was shared with, when, why and what action followed.

### **11.4 Transfer of safeguarding records**

When a pupil moves to another school or education provider, the DSL must ensure that the safeguarding file is transferred securely, separately from the main pupil file and as soon as possible. For in-year transfers, safeguarding information should be transferred within five school days where practicable. For planned transfers at the start of a new term, the file should be transferred within the first five school days of the new term.

Where concerns are significant, complex or current, the DSL should speak directly with the receiving DSL to ensure continuity of support and risk management. The transfer date, method, recipient and any professional discussion must be recorded.

Where current or significant safeguarding information is needed to protect a pupil, the DSL must share essential information with the receiving setting before or at the point of transfer so that safeguarding concerns are understood and support can continue without delay.

### **11.5 Confidentiality, retention and quality assurance**

Safeguarding records must be treated as confidential, but confidentiality must never be used as a barrier to protecting a pupil. Records must be retained in line with Trust records retention requirements and statutory expectations. DSLs must monitor the quality of safeguarding records, including timeliness, clarity, actions, outcomes, chronologies and follow-up. Trust safeguarding assurance may include CPOMS quality assurance and review of record-keeping practice.

## **12. Safer recruitment and single central record expectations**

Discovery Trust is committed to preventing unsuitable adults from working with pupils. Safer recruitment is a core safeguarding control and applies to all appointments, including permanent, temporary, fixed-term, casual, supply, agency, volunteer, contractor, trustee and governance roles where relevant.

### **12.1 Safer recruitment principles**

Safer recruitment must ensure that:

- safeguarding is built into every stage of recruitment, from advertising to appointment;
- role descriptions, person specifications and adverts make clear the Trust's commitment to safeguarding and promoting pupils' welfare;
- shortlisting takes account of safeguarding information, including gaps in employment or education history where relevant;
- references are obtained, scrutinised and followed up where there are concerns or inconsistencies;
- interviews explore suitability to work with pupils, including safeguarding understanding, professional boundaries and safer working practice;
- at least one person involved in recruitment has completed appropriate safer recruitment training; and
- no person starts work unless all required pre-employment checks have been completed or an approved risk-assessed exception has been authorised and recorded.

### **12.2 Pre-employment and suitability checks**

Required checks must be completed in line with statutory guidance, safer recruitment requirements and Trust HR procedures. These may include identity, right to work, employment history, qualifications, professional registration, references, DBS checks, barred list checks, prohibition checks, Section 128 checks where applicable, overseas checks and checks on individuals who have lived or worked outside the UK.

Where concerns arise during recruitment or vetting, leaders must seek HR and safeguarding advice before appointment. Any decision to proceed must be risk assessed, authorised and recorded. The Trust will not knowingly appoint any person who is barred from regulated activity or otherwise unsuitable to work with pupils.

### **12.3 Supply colleagues, agency workers, volunteers, contractors and visitors**

Schools must ensure that appropriate checks, written assurances, supervision arrangements and safeguarding information are in place for supply colleagues, agency workers, volunteers, trainees, contractors, visiting professionals and organisations using Trust premises. Schools must verify identity on arrival and ensure visitors are supervised unless checks and purpose of visit justify otherwise.

Where an agency or third-party provider supplies an adult to work with pupils, the school must obtain written confirmation that the required checks have been completed and must record the appropriate assurance on the single central record where required. Any safeguarding concern or allegation about such an adult must be managed in line with this policy and the LADO process where appropriate.

### **12.4 Single central record**

Each Discovery Trust school must maintain an accurate, complete and up-to-date single central record of recruitment and vetting checks. The single central record must reflect statutory requirements and Trust expectations and must be available for safeguarding assurance, internal audit and inspection.

The single central record must include, where applicable:

- identity checks;
- barred list checks where required;
- enhanced DBS checks and date of check;
- prohibition from teaching checks where relevant;

Section 128 checks where relevant;  
right to work checks;  
qualification and professional registration checks where required;  
overseas checks where applicable;  
written confirmation of checks for supply colleagues, agency workers and relevant third-party adults;  
risk assessments or authorised exceptions where applicable; and  
the name or role of the person who completed or verified the check.

### **12.5 Trust assurance**

Headteachers are responsible for ensuring that the single central record is accurate and kept under regular review. Trust HR and safeguarding assurance activity may include sampling recruitment files, checking SCR accuracy, reviewing safer recruitment compliance and identifying any actions required. Any material safeguarding or compliance concern must be escalated to the Trust Head of Safeguarding, HR and the CEO where appropriate.

## **13. Managing allegations against adults working with pupils**

This section applies where it is alleged that an adult working in or on behalf of Discovery Trust may have harmed a pupil, may have committed a criminal offence against or related to a pupil, may pose a risk of harm to pupils, or may have behaved in a way that indicates they may not be suitable to work with pupils. This includes concerns about behaviour inside or outside work.

### **13.1 Immediate reporting**

The following reporting expectations apply:

Any allegation or concern that may meet the harm threshold must be reported immediately to the Headteacher.

If the allegation concerns the Headteacher, it must be reported to the Chair of the Advisory Board and the relevant Phase Director.

If the allegation concerns the CEO or a trustee, it must be reported to the Chair of Trustees and appropriate external advice must be sought.

Where any safeguarding concern, allegation or low-level concern relates to a colleague, volunteer, contractor, supply colleague, agency worker or other adult working with pupils, the Trust Head of Safeguarding must also be informed, unless doing so would create a conflict of interest or compromise the integrity of an investigation. This does not replace the required reporting route to the Headteacher, Chair of Advisory Board, Phase Director, Chair of Trustees, LADO, HR or statutory agencies where applicable.

The LADO must be consulted where the harm threshold may be met or where there is doubt about whether the threshold is met.

Where the allegation concerns the Headteacher, CEO, trustee or another senior leader and may meet the harm threshold, LADO consultation must take place without delay. Internal notification, governance consultation or HR advice must not delay urgent contact with the LADO, children's social care, police or emergency services where required.

Colleagues must not investigate the allegation themselves, alert the adult concerned without appropriate advice, or delay reporting while seeking further information.

### **13.2 Case manager and Trust oversight**

The case manager will normally be the Headteacher. Where the allegation concerns the Headteacher, the case manager will be identified in consultation with the Chair of the Advisory Board, the relevant Phase Director, the LADO and appropriate HR or governance advice. Where

the allegation concerns the CEO, a trustee or a person in a senior Trust role, the case manager will be identified by the Trust in consultation with the Chair of Trustees, the LADO and appropriate HR or governance advice. The Trust Head of Safeguarding must be informed of adult-related safeguarding concerns, allegations and low-level concerns, unless there is a conflict of interest or doing so would compromise the integrity of an investigation, so that Trust oversight, advice, assurance and pattern analysis can be maintained.

### **13.3 Initial action and LADO consultation**

The case manager must gather only enough initial information to establish the basic facts and determine whether LADO consultation is required. They must not conduct an internal investigation before consulting the LADO where the harm threshold may be met. The LADO will advise on next steps, including whether children's social care, the police, HR, regulatory bodies or the adult's employer should be involved.

### **13.4 Suspension and risk management**

Suspension must not be the default response. The case manager, with HR and LADO advice where appropriate, must consider whether the pupil and other pupils can be safeguarded through alternatives such as adjusted duties, increased supervision, redeployment, restricted access to pupils, remote working or other risk management measures. Where suspension is necessary, the rationale and alternatives considered must be recorded clearly.

### **13.5 Supply colleagues, contractors, volunteers and external organisations**

Allegations involving supply colleagues, agency workers, volunteers, contractors, visiting professionals, lettings users or external organisations must be managed with the same level of seriousness as allegations involving Trust employees. The school or Trust must not simply stop using an individual or provider without establishing the facts and consulting the LADO where required. The relevant employer, agency or organisation must be involved appropriately and safeguarding information must be shared as necessary.

### **13.6 Confidentiality, records and outcomes**

Allegations must be handled confidentially and shared only with those who need to know. The case manager must maintain a clear record of the allegation, advice received, decisions, rationale, risk management, action taken and outcome. Records must be retained in line with statutory requirements and Trust records retention arrangements. Outcomes may include substantiated, unsubstantiated, unfounded, false or malicious, and must be recorded accurately without implying guilt where evidence does not support this.

### **13.7 Referrals, references and learning lessons**

Where an allegation is substantiated or the Trust ceases to use an individual's services because they are considered unsuitable to work with pupils, the Trust must consider whether referral to the DBS, Teaching Regulation Agency or other relevant regulatory body is required. References must be handled in line with statutory guidance and Trust HR procedures. Following any allegation, the case manager and Trust must consider whether lessons can be learned to strengthen safeguarding practice, safer recruitment, supervision, training, site arrangements or professional conduct expectations.

## **14. Low-level concerns about adults**

Discovery Trust is committed to a culture of openness, trust and transparency in which colleagues feel confident to report concerns about adult conduct at the earliest opportunity. Low-level concerns must be taken seriously, recorded and responded to proportionately so that inappropriate, problematic or concerning behaviour can be addressed before it escalates.

### **14.1 Definition**

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of Discovery Trust may have acted in a way that is inconsistent with the Staff Code of Conduct, including conduct outside work, but does not appear to meet the harm threshold for an allegation. A low-level concern may still indicate safeguarding risk, a breach of professional expectations, or the need for advice, support, training or management action.

### **14.2 Examples of low-level concerns**

Examples may include:

- being over-familiar with pupils or having favourites;
- using language, tone or humour that is inappropriate, humiliating, intimidating or inconsistent with professional standards;
- communicating with pupils in a way that does not follow Trust or school expectations;
- using personal phones, cameras or devices inappropriately around pupils;
- meeting or being alone with a pupil in a secluded area without appropriate visibility, recording or authorisation;
- sharing personal information with pupils or blurring professional boundaries;
- failing to follow agreed supervision, behaviour, intimate care, physical intervention or safeguarding procedures;
- minor boundary breaches, repeated poor judgement or conduct that causes discomfort or concern; and
- conduct outside work that may raise questions about suitability, judgement or professional boundaries.

### **14.3 Reporting low-level concerns**

All low-level concerns must be reported promptly to the Headteacher. Where the concern relates to the Headteacher, it must be reported to the Chair of the Advisory Board and the relevant Phase Director. Where the concern relates to the CEO or a trustee, it must be reported to the Chair of Trustees. The Trust Head of Safeguarding must also be informed of adult-related safeguarding concerns, including low-level concerns, unless doing so would create a conflict of interest or compromise the integrity of an investigation.

Colleagues are encouraged to self-report where they have acted in a way that may be misinterpreted, may have fallen below expected standards, or may have created a safeguarding or professional boundary concern. Self-reporting supports transparency and allows concerns to be addressed fairly and proportionately.

### **14.4 Responding to low-level concerns**

The Headteacher will review the concern promptly, seek advice from HR, the DSL, the Trust Head of Safeguarding or the LADO where appropriate, and decide the proportionate response. The response may include clarification, advice, supervision, training, management guidance, formal HR action, referral to the LADO where the harm threshold may be met, or other safeguarding action. The rationale for decisions must be recorded.

#### **14.5 Recording, review and pattern analysis**

All low-level concerns must be recorded in writing, including the concern, context, individuals involved, action taken, advice received, outcome and rationale. Records must be held securely and reviewed so that patterns of behaviour can be identified. A single concern may appear minor in isolation but may become significant when viewed alongside previous concerns, complaints, conduct issues or safeguarding information.

Where a pattern of low-level concerns suggests that the harm threshold may be met, or where there is uncertainty, the LADO must be consulted. Where a concern relates to a supply colleague, contractor, volunteer, agency worker or external provider, the relevant employer or organisation must be informed where appropriate so that patterns can be considered across settings.

#### **14.6 References and retention**

Low-level concerns will not normally be included in references unless they have met the threshold for referral to the LADO and have been substantiated, or where they relate to matters that would ordinarily be included in a reference, such as misconduct or poor performance. Records must be retained in line with statutory guidance, Trust HR procedures and records retention arrangements.

### **15. Whistleblowing, professional challenge and escalation**

Discovery Trust expects all colleagues to raise safeguarding concerns, challenge unsafe practice and escalate unresolved safeguarding risk. A strong safeguarding culture depends on openness, professional curiosity and the confidence to speak up where a pupil may be at risk or where adult conduct, systems or leadership decisions may compromise safeguarding.

#### **15.1 Whistleblowing**

Colleagues must use the Trust's whistleblowing procedures where they believe safeguarding concerns, poor or unsafe practice, failures to follow policy, failures to act, or attempts to minimise concerns are not being addressed through normal reporting routes. Whistleblowing concerns may relate to individual conduct, leadership decisions, organisational culture, recruitment, record keeping, allegations management, low-level concerns, online safety, attendance, alternative provision, site safety or any other safeguarding matter.

Colleagues may also seek advice from the NSPCC whistleblowing helpline or from statutory safeguarding partners where they believe a pupil is at risk and the concern has not been addressed appropriately. No colleague should suffer detriment for raising a safeguarding concern in good faith.

#### **15.2 Professional challenge**

Professional challenge is an expected part of safeguarding practice. Colleagues must respectfully challenge decisions or actions where they believe a pupil remains at risk, a concern has not been understood, a referral has not been accepted, information has not been shared appropriately, or agreed actions have not been completed.

Concerns should normally be raised first with the DSL or deputy DSL. Where the concern relates to the DSL, Headteacher, adult conduct or the school leadership response, colleagues must use the relevant reporting route in this policy and may seek advice from the Trust Head of Safeguarding, HR, the CEO, the Chair of the Advisory Board, the Phase Director, the Chair of Trustees, the LADO or statutory partners as appropriate.

#### **15.3 Escalation**

The following escalation expectations apply:

Where a pupil may be at immediate risk of harm, colleagues must contact the DSL, children's social care, police or emergency services without delay.

Where a safeguarding referral is not accepted but concerns remain, the DSL must follow local escalation procedures and record the rationale, advice received and next steps.

Where school-level action does not resolve safeguarding risk, the matter must be escalated to the Trust Head of Safeguarding and, where appropriate, the CEO.

Where the matter concerns an adult working with pupils, the allegations or low-level concerns route must be followed and the Trust Head of Safeguarding must also be informed unless there is a conflict of interest or doing so would compromise an investigation.

Where escalation involves external agencies, the school must record who was contacted, when, what information was shared, the advice received and the outcome.

#### **15.4 Recording and learning**

Whistleblowing concerns, professional challenge and escalation activity must be recorded proportionately and securely. Leaders must consider whether concerns indicate wider learning, training needs, policy gaps, supervision needs, cultural issues or assurance actions. The Trust Head of Safeguarding may use escalation themes to inform Trust safeguarding assurance and reporting to senior leaders and trustees.

### **16. Child-on-child abuse, sexual violence and sexual harassment**

Discovery Trust has a zero-tolerance approach to child-on-child abuse, sexual violence and sexual harassment. Such behaviour is never acceptable, must never be dismissed as banter, part of growing up, boys being boys or normalised behaviour, and must always be taken seriously. All schools must maintain an "it could happen here" culture, including where there are no reported incidents.

#### **16.1 Forms of child-on-child abuse**

Child-on-child abuse may include:

bullying, including cyberbullying, prejudice-based bullying and discriminatory bullying;

physical abuse, violence, threats or intimidation;

abuse within intimate personal relationships between pupils;

sexual violence, including rape, assault by penetration and sexual assault;

sexual harassment, including sexual comments, jokes, gestures, unwanted sexual attention, pressure, coercion and online sexual harassment;

harmful sexual behaviour, including developmentally inappropriate or abusive sexual behaviour;

causing another pupil to engage in sexual activity without consent;

sharing, creating, requesting or threatening to share nudes or semi-nudes, including digitally manipulated or AI-generated images;

upskirting or other image-based abuse;

abuse, coercion, harassment or humiliation linked to initiation or hazing behaviours; and

online abuse, including abusive messages, group chat abuse, misogynistic content, image sharing, impersonation, doxxing, threats or harassment.

#### **16.2 Responding to reports**

All reports must be handled sensitively, promptly and in line with the child protection procedures in this policy. Pupils who report abuse must be listened to, reassured, taken seriously and protected from retaliation. Colleagues must not promise confidentiality, investigate the matter themselves, ask leading questions or take any action that could compromise a statutory investigation.

The DSL will consider the wishes and feelings of the pupil who has experienced harm, the needs and circumstances of the pupil alleged to have caused harm, the nature of the incident, any power imbalance, age and developmental stage, SEND or additional vulnerabilities, online elements, wider peer-group issues, previous concerns and whether police or children's social care involvement is required.

### **16.3 Risk assessment and safety planning**

Where sexual violence, serious sexual harassment, harmful sexual behaviour or significant child-on-child abuse is reported, the DSL must consider whether a written risk assessment and safety plan is required. This should address supervision, movement around school, timetable arrangements, online concerns, transport, attendance, contact between pupils, support needs, communication with parents and carers where appropriate, and any external agency involvement.

### **16.4 Supporting pupils who have experienced harm**

Schools must ensure that pupils who have experienced child-on-child abuse, sexual violence or sexual harassment are supported in a way that is safe, respectful and responsive to their needs. Support may include a trusted adult, pastoral support, safety planning, adjustments to routines, SEND support, mental health support, attendance support, curriculum support, liaison with parents or carers where appropriate, and referral to specialist services.

### **16.5 Responding to pupils who have caused harm**

Pupils who have caused, or are alleged to have caused, harm must be responded to through a safeguarding lens as well as through behaviour systems where appropriate. The response must be proportionate, consider the pupil's age, development, SEND, trauma, previous experiences and potential risk to others, and must not minimise the harm caused. Where harmful sexual behaviour is identified or suspected, specialist advice or assessment should be considered.

### **16.6 Parents, carers and statutory partners**

Parents and carers should normally be informed where their child is involved in a report of child-on-child abuse, sexual violence or sexual harassment, unless doing so would increase safeguarding risk, compromise an investigation or conflict with statutory advice. The DSL will work with children's social care, police, health, family help / early help services, specialist services and other agencies where appropriate.

### **16.7 Prevention, culture and curriculum**

Schools must actively prevent child-on-child abuse through a culture of respect, equality, inclusion and challenge. The curriculum, including RSHE, online safety, behaviour, anti-bullying, equality and safeguarding education, must help pupils understand consent, healthy relationships, respectful behaviour, personal safety, online risks, reporting routes and how to seek help for themselves or others.

### **16.8 Recording and review**

All reports, decisions, risk assessments, safety plans, referrals, outcomes and review actions must be recorded on CPOMS. DSLs must review incidents for patterns, including repeated behaviour, peer-group concerns, locations, online platforms, protected characteristics, SEND or vulnerability factors and wider cultural issues. Trust safeguarding assurance may review themes and actions as part of wider safeguarding monitoring.

## 17. Online safety, filtering and monitoring

Online safety is a core part of safeguarding. Discovery Trust recognises that technology is central to pupils' learning, communication and social lives, but can also expose pupils to abuse, exploitation, harmful content, harmful contact, harmful conduct and safeguarding concerns that may escalate quickly. Online safety must be considered in leadership, curriculum, behaviour, attendance, safeguarding, IT, filtering and monitoring, data protection and site procedures.

### 17.1 Online safety concerns

**Content:** exposure to illegal, inappropriate or harmful material, including abuse material, pornography, racism, misogyny, self-harm, suicide content, extremist content, misinformation, disinformation, conspiracy theories, harmful challenges and AI-generated harmful content.

**Contact:** harmful interaction with others online, including grooming, coercion, exploitation, peer pressure, impersonation, adults posing as children, radicalisation, financial exploitation and organised criminal activity.

**Conduct:** online behaviour that causes or increases harm, including cyberbullying, harassment, image-based abuse, sharing nudes or semi-nudes, abusive messages, group chat abuse, online sexual harassment, doxxing, threats and harmful sexual behaviour.

**Commerce:** risks linked to gambling, scams, phishing, fraud, inappropriate advertising, account theft, financial exploitation, in-game purchases, cryptocurrency or money mule activity.

### 17.2 Roles and accountability

Trustees and senior leaders must ensure that appropriate filtering and monitoring systems are in place and that online safety is embedded within the Trust's safeguarding arrangements. Each school must identify a senior leader responsible for filtering and monitoring, supported by the DSL and IT support. DSLs must understand the filtering and monitoring systems in place, know how concerns are identified and escalated, and ensure online safety concerns are recorded and responded to as safeguarding matters.

### 17.3 Filtering and monitoring

Discovery Trust schools must provide a safe online environment through appropriate filtering and monitoring systems. Filtering is preventative and helps block access to illegal, inappropriate or harmful online content. Monitoring is reactive and helps identify concerning activity, patterns or alerts that require safeguarding review or action.

Schools must ensure that:

- filtering and monitoring responsibilities are clearly assigned and understood;
- systems are proportionate to the school's age range, context, devices, network and pupil needs;
- filtering applies to school networks and all relevant school-owned or managed devices;
- monitoring alerts or reports are reviewed promptly by appropriate colleagues;
- safeguarding concerns identified through monitoring are recorded on CPOMS and escalated to the DSL;
- filtering does not unreasonably restrict teaching, learning or access to appropriate safeguarding, health or support information;
- checks are completed and recorded to confirm that filtering works on relevant devices and in relevant locations; and
- the effectiveness of filtering and monitoring is reviewed at least once every academic year by the senior leader responsible, supported by the DSL and IT support.

The annual review must consider whether filtering and monitoring arrangements are effective for illegal, inappropriate and harmful content across web, app, image, video, audio, user-generated,

real-time, dynamic, personalised and AI-generated content, including school-owned or managed devices used off site where relevant. Any gaps, technical limitations, provider assurances, testing evidence, actions and residual risks must be recorded and escalated where necessary.

#### **17.4 Artificial intelligence and emerging technology**

Artificial intelligence and emerging technologies can support education and safeguarding but may also create or intensify safeguarding risk. This includes AI-generated harmful content, deepfakes, image manipulation, impersonation, grooming, bullying, sexual extortion, misinformation, disinformation, plagiarism-related pressures, data protection concerns and unsafe use of pupil images or information.

Schools must risk assess new AI tools before use with pupils or pupil information and ensure that use is consistent with Trust expectations, data protection requirements, filtering and monitoring standards, curriculum expectations and safeguarding procedures. AI-related safeguarding concerns must be recorded and managed in the same way as other safeguarding concerns. Schools must ensure that colleagues know how to recognise, record and escalate AI-related safeguarding concerns, including synthetic or manipulated imagery, impersonation, sextortion, coercion, online misogyny, harmful ideologies, exploitation and misuse of pupil voice, image, data or identity.

#### **17.5 Mobile and smart technology**

Schools must set clear expectations for the safe and professional use of mobile phones, cameras, wearable technology and smart devices by pupils, colleagues, volunteers, visitors and contractors. Colleagues must not use personal devices to take images or recordings of pupils unless this is explicitly authorised through school procedures and consistent with Trust policy. Local arrangements for pupil mobile technology, visitor expectations and device use must be set out in the School Safeguarding Local Arrangements Addendum or linked school procedures.

#### **17.6 Education, reporting and parent/carers engagement**

Pupils must be taught how to use technology safely, respectfully and responsibly through the curriculum, including RSHE, computing, behaviour, anti-bullying and safeguarding education. This should include online relationships, consent, privacy, image sharing, harmful content, misinformation, reporting routes, digital resilience, online exploitation, financial risk and how to seek help.

Schools should engage parents and carers in online safety through appropriate communication, guidance and signposting. Pupils, colleagues and parents/carers must know how to report online safety concerns, including concerns that occur outside school but affect pupil welfare, attendance, peer relationships or safety in school.

#### **17.7 Local arrangements and Trust assurance**

Each school's School Safeguarding Local Arrangements Addendum must identify the local filtering provider, monitoring arrangements, alert-review process, named responsible leaders, escalation route and any school-specific mobile or smart technology arrangements. Trust safeguarding assurance may include review of filtering and monitoring evidence, online safety incidents, CPOMS records, annual review outcomes and actions arising.

### **18. Attendance, absence and children missing education**

Attendance is a safeguarding matter. Discovery Trust expects schools to identify, understand and respond to absence early, particularly where absence is repeated, prolonged, unexplained, persistent, severe or linked to known vulnerability. Absence may indicate abuse, neglect,

exploitation, mental health need, unmet SEND, family stress, domestic abuse, radicalisation, child criminal exploitation, child sexual exploitation, forced marriage, FGM, homelessness, bullying or other safeguarding concern.

### **18.1 Attendance as part of safeguarding**

Schools must:

- promote a culture in which good attendance is understood as essential to safety, belonging, learning and wellbeing;

- maintain accurate attendance and admission registers in line with statutory requirements;

- follow up absence promptly, including first-day response where required by school procedure;

  - analyse attendance information to identify patterns, vulnerable pupils, emerging safeguarding concerns and pupils at risk of persistent or severe absence;

- work with pupils, parents and carers to understand and remove barriers to attendance wherever possible;

  - share information with the DSL, attendance lead, SENCO, pastoral leaders, social workers, virtual school, local authority and other partners where attendance concerns may indicate safeguarding risk; and

- record safeguarding-related attendance concerns, decisions and actions on CPOMS.

### **18.2 Pupils who are absent from education**

Where a pupil is repeatedly or persistently absent, severely absent, absent without explanation, missing from lessons, absent from alternative provision, or absent in circumstances that raise safeguarding concern, the DSL and attendance lead must consider whether safeguarding action is required. This may include family help / early help, referral to children's social care, police contact, local authority attendance support, or escalation through local procedures.

Schools must be particularly alert where absence relates to pupils with SEND or health needs, pupils with a social worker, looked-after or previously looked-after pupils, young carers, pupils affected by domestic abuse, pupils at risk of exploitation, pupils experiencing bullying or discrimination, pupils on part-time timetables, pupils attending alternative provision, and pupils who have recently joined, moved school or returned from extended absence.

### **18.3 Children missing education**

Children missing education are children of compulsory school age who are not registered at a school and are not receiving suitable education otherwise than at school. Schools must follow statutory and local authority requirements for identifying, reporting and supporting children who may be missing education, including where a pupil leaves school without a confirmed destination or does not start at an expected school.

Schools must make reasonable enquiries, follow local authority notification routes and avoid removing a pupil from roll unless statutory requirements have been met. Where there is a safeguarding concern, the DSL must consider whether additional action is needed, including referral to children's social care or police.

### **18.4 Elective home education, part-time timetables and off-site education**

Where parents or carers indicate that they intend to electively home educate, or where a reduced or part-time timetable is proposed, leaders must consider the pupil's welfare, safeguarding needs, SEND, attendance history and any known agency involvement. Decisions must be recorded and must not be used as a default response to unmet need, behaviour, attendance difficulties or safeguarding concerns.

Where pupils are educated off site, including through alternative provision, schools remain responsible for safeguarding oversight. Attendance must be monitored daily or in line with agreed safeguarding arrangements, and any unexplained absence must be followed up promptly by the school and provider.

### **18.5 Escalation, recording and local arrangements**

Attendance-related safeguarding decisions must be recorded clearly, including actions taken to contact parents or carers, speak with the pupil, check welfare, liaise with other agencies, complete home visits where appropriate, make referrals or escalate concerns. Where absence remains unexplained or safeguarding risk increases, schools must follow local authority procedures and seek advice from the Trust Head of Safeguarding where appropriate.

Each school's School Safeguarding Local Arrangements Addendum must identify local attendance and children missing education referral routes, named attendance leads, local authority contact points, arrangements for pupils absent from alternative provision, and any site-specific procedures for pupils missing during the school day, non-collection, educational visits, extended provision or transport.

## **19. Pupils with SEND and additional vulnerabilities**

Discovery Trust recognises that some pupils are more vulnerable to harm, may experience additional barriers to disclosure, or may be less likely to be heard or understood. Schools must ensure that safeguarding practice is inclusive, accessible and responsive to individual need, including where pupils have SEND, health needs, communication needs, care experience, social care involvement, mental health needs, experience of trauma, discrimination or other additional vulnerabilities.

Pupils with SEND, disabilities or health needs may face additional safeguarding challenges. Colleagues must avoid assumptions that changes in behaviour, mood, attendance, communication, physical presentation or injuries are automatically linked to a pupil's identified need. Concerns must always be explored with professional curiosity and shared with the DSL or deputy DSL.

Additional safeguarding challenges may include:

- communication barriers or difficulty explaining what has happened;
- reliance on adults or peers for care, communication, transport or personal support;
- increased risk of isolation, bullying, prejudice-based abuse or exploitation;
- behaviour, distress or attendance concerns being misinterpreted as part of a pupil's SEND or health need;
- reduced ability to recognise unsafe relationships, coercion, grooming or online risk;
- greater vulnerability during intimate care, physical intervention, medical support, transport or off-site provision; and
- barriers to accessing reporting routes, trusted adults or safeguarding education.

### **19.1 Inclusive safeguarding practice**

Schools must ensure that pupils with additional vulnerabilities can access safeguarding support. This may include communication aids, reasonable adjustments, trusted adults, adapted reporting routes, sensory or regulation support, additional pastoral support, enhanced supervision, individual risk assessment, safety planning or liaison with specialist services.

### **19.2 Working together around vulnerable pupils**

The DSL, SENCO, attendance lead, designated teacher, pastoral leaders, mental health lead and relevant class or form colleagues must share information appropriately and work together to

understand the pupil's needs, safeguarding concerns, strengths and support arrangements. Safeguarding concerns must not be considered in isolation from SEND, attendance, behaviour, mental health, family circumstances, social care involvement or wider vulnerability.

### **19.3 Pupils with a social worker or previous social care involvement**

Pupils may have a social worker because of safeguarding or welfare needs. A pupil's experiences of adversity, trauma or family difficulty may affect attendance, learning, behaviour, relationships, mental health and safety. Where a school knows that a pupil has, or has had, a social worker, this information must inform safeguarding decisions, attendance responses, pastoral support, behaviour decisions and educational planning.

The DSL must work with social workers and other agencies to help protect and support pupils. This includes sharing relevant information, attending meetings where appropriate, contributing to assessments and plans, and ensuring that school actions support the pupil's safety, welfare and educational outcomes.

### **19.4 Mental health, trauma and emotional wellbeing**

Mental health concerns may be an indicator of abuse, neglect, exploitation, trauma, unmet need or wider safeguarding concern. Colleagues must not attempt to diagnose mental health conditions, but they must record and report concerns where a pupil's presentation, behaviour, self-harm, suicidal ideation, withdrawal, anxiety, distress, risk-taking, attendance or relationships may suggest safeguarding or welfare need.

### **19.5 Pupils affected by discrimination or identity-based harm**

Pupils affected by discrimination, prejudice, racism, misogyny, homophobia, biphobia, transphobia, ableism, poverty or other forms of identity-based harm may be at increased safeguarding risk. Colleagues must take concerns seriously, respond without victim-blaming, record and report concerns to the DSL, and ensure pupils have safe and accessible routes to seek help.

Where a pupil is experiencing identity-related vulnerability, including where they are questioning gender, schools must respond sensitively and on a case-by-case basis. Leaders must avoid assumptions, consider safeguarding, mental health, SEND, family context, bullying, discrimination and peer or online risk, and seek appropriate advice where needed.

## **20. Looked-after and previously looked-after pupils**

Discovery Trust recognises that looked-after and previously looked-after pupils may have experienced adversity, trauma, disruption, loss or changes in care arrangements that can affect their safety, wellbeing, attendance, relationships and learning. Safeguarding practice for these pupils must be informed by their legal status, care arrangements, voice, needs and vulnerabilities. Each school must have a designated teacher for looked-after and previously looked-after pupils. The designated teacher must have appropriate training, knowledge and access to relevant information to promote educational achievement and work effectively with the DSL, SENCO, pastoral leaders, carers, social workers, virtual schools and other professionals.

### **20.1 Information, care status and safeguarding oversight**

Schools must:

- ensure appropriate colleagues have relevant information about the pupil's looked-after or previously looked-after status, care arrangements, contact arrangements and who has parental responsibility;

ensure the DSL has details of the pupil's social worker and relevant virtual school contact where applicable;

consider how care experience, trauma, loss, placement change, contact arrangements or family circumstances may affect safeguarding, attendance, behaviour, relationships and learning;

ensure safeguarding concerns are shared promptly with the DSL and relevant professionals; and

ensure the pupil's voice is considered in decisions about support, safety and education.

### **20.2 Personal education plans and virtual school liaison**

For looked-after pupils, the designated teacher must contribute to the personal education plan and work with the virtual school, social worker, carers and school colleagues to ensure that safeguarding, attendance, SEND, wellbeing and educational needs are considered together. Pupil premium plus and other support should be used in a targeted way to meet identified needs and improve outcomes.

### **20.3 Previously looked-after pupils**

Previously looked-after pupils may continue to require support because of previous adversity, care experience, adoption, special guardianship, child arrangements orders or family circumstances. Schools must ensure that safeguarding, pastoral, SEND and attendance support remains sensitive to these experiences and that parents or carers are involved appropriately and respectfully.

### **20.4 Local arrangements**

The name of the school's designated teacher, relevant virtual school contact details and any local arrangements for supporting looked-after and previously looked-after pupils must be recorded in the School Safeguarding Local Arrangements Addendum.

## **21. Alternative provision and off-site safeguarding**

Discovery Trust schools remain responsible for the safeguarding, welfare, attendance and educational oversight of pupils who attend alternative provision, off-site education or any provision arranged or commissioned by the school. Alternative provision must never be used to reduce responsibility for a pupil whose needs, behaviour, attendance or safeguarding circumstances require support.

### **21.1 Pre-placement safeguarding checks**

Before a placement starts, schools must:

- complete appropriate safeguarding and suitability checks;

- confirm the provider's safeguarding policy, DSL arrangements, safer recruitment checks, site safety, behaviour arrangements, attendance procedures and emergency contacts;

- consider whether the provision can meet the pupil's age, SEND, health, communication, behaviour, attendance and safeguarding needs;

- share relevant safeguarding, SEND, medical, attendance and risk information with the provider before placement, where necessary to protect the pupil or others;

- ensure parents or carers understand the placement arrangements, unless there is a safeguarding reason not to share specific information; and

- record the checks, decision-making rationale and approval before the placement begins.

### **21.2 Written agreements and expectations**

Before a pupil attends alternative provision or regular off-site education, the school must ensure that expectations are clear and recorded. This should include safeguarding contacts, attendance

reporting, incident reporting, information sharing, transport arrangements, supervision, behaviour expectations, curriculum arrangements, emergency procedures, review dates and action to be taken if concerns arise.

### **21.3 Attendance, absence and daily oversight**

The school must know whether the pupil has attended alternative provision or off-site education as expected. Attendance arrangements must be agreed in advance and unexplained absence must be followed up promptly by both the provider and the school. Where absence raises safeguarding concern, the DSL and attendance lead must act in line with the attendance and child protection sections of this policy.

### **21.4 Ongoing quality assurance and review**

Schools must keep alternative provision under regular review. Oversight should include attendance, safeguarding incidents, pupil voice, progress, wellbeing, behaviour, SEND support, provider communication and whether the provision remains suitable. Reviews must be recorded and must take place at least half-termly, and more frequently where risk, attendance concerns, SEND, safeguarding concerns, placement instability or provider suitability concerns require it.

### **21.5 Safeguarding concerns in alternative provision**

Any safeguarding concern arising within alternative provision or off-site education must be shared with the school DSL without delay and recorded on CPOMS. Where the concern relates to an adult working at the provider, the school must ensure that the provider follows appropriate allegations or low-level concerns procedures and that the LADO is consulted where the harm threshold may be met. The Trust Head of Safeguarding must be informed of significant concerns, provider suitability concerns or repeated issues.

### **21.6 Local arrangements**

Each school's School Safeguarding Local Arrangements Addendum must identify any alternative provision or off-site education used by the school, the named school lead for oversight, attendance processes, safeguarding contacts, review frequency, information-sharing arrangements and action to be taken if concerns arise.

## **22. Safeguarding training and induction**

Discovery Trust expects all colleagues and adults working with pupils to receive safeguarding induction, training and updates appropriate to their role. Training must enable colleagues to understand their responsibilities, recognise signs of abuse, neglect and exploitation, respond to concerns, record and report information, maintain professional boundaries and contribute to a strong safeguarding culture.

### **22.1 Induction**

Induction must include:

this policy and the School Safeguarding Local Arrangements Addendum;

Part One of Keeping Children Safe in Education 2026 in full, with the Part One overview used only as a supporting quick-reference tool and not as a replacement for reading Part One;

the Staff Code of Conduct;

the school's behaviour, attendance, online safety and whistleblowing arrangements;

how to report concerns about pupils and adults;

how to record concerns on CPOMS or the agreed interim system;

the identity and availability of the DSL and deputy DSLs;  
expectations for professional conduct, safer working practice and low-level concerns; and  
local emergency, visitor, site and pupil reporting arrangements.

### **22.2 Safeguarding training and updates for all colleagues**

All colleagues must receive safeguarding and child protection training at induction and regular updates thereafter. Training must be refreshed at least annually and supplemented by briefings, updates, supervision, newsletters, scenario discussions, CPOMS feedback, policy updates or other professional learning where appropriate. Training must reflect current statutory guidance, local safeguarding priorities, Trust learning and school contextual safeguarding concerns.

### **22.3 DSL and deputy DSL training**

DSLs and deputy DSLs must receive training that provides the knowledge and skills required to carry out the role effectively. This must be updated at least every two years, with knowledge and skills refreshed regularly between formal training. DSL training must include child protection, family help / early help, referrals, information sharing, online safety, filtering and monitoring, child-on-child abuse, allegations, low-level concerns, SEND and vulnerable pupils, attendance, alternative provision, Prevent and local multi-agency procedures.

### **22.4 Trustee, Advisory Board and leadership training**

Trustees, Advisory Board members, executive leaders and senior leaders must receive safeguarding training appropriate to their strategic or operational responsibilities. This must include understanding statutory duties, whole-school safeguarding culture, online safety, filtering and monitoring, safer recruitment, allegations, low-level concerns, attendance, alternative provision, SEND and additional vulnerability, assurance activity and escalation routes.

### **22.5 Role-specific safeguarding training**

Additional role-specific training must be provided where responsibilities require it. This may include safer recruitment, Prevent, designated teacher training, attendance, SEND, online safety, filtering and monitoring, educational visits, intimate care, physical intervention, first aid, medical needs, alternative provision, transport, extended provision, site management, HR, governance, data protection and managing allegations or low-level concerns.

### **22.6 Volunteers, visitors, contractors and external providers**

Volunteers, regular visitors, contractors, supply colleagues, agency workers and external providers must receive safeguarding information appropriate to their role, contact with pupils and level of supervision. Schools must ensure that they understand how to report concerns, who the DSL is, what to do in an emergency, and the professional conduct expected on school premises or during school activity.

### **22.7 Training records and compliance**

Headteachers must ensure that safeguarding training, induction and updates are recorded and monitored. The Trust may review training compliance through audits, assurance visits, governance reporting, CPOMS quality assurance, safer recruitment checks and school improvement activity. Where colleagues have not completed required training, leaders must take prompt action to manage safeguarding risk and secure completion.

## **23. Policy review, monitoring and Trust assurance**

Discovery Trust will monitor the implementation and effectiveness of this policy through Trust-wide safeguarding assurance, school-level review, governance reporting and continuous improvement activity. Safeguarding assurance must focus on whether arrangements are understood, embedded, consistently applied and improving outcomes for pupils.

### **23.1 Policy review**

This policy will be reviewed at least annually by the Trust Head of Safeguarding and approved by the Trust Board. The policy will also be reviewed sooner where there are changes to statutory guidance, legislation, local safeguarding arrangements, Trust structure, inspection findings, serious incidents, learning reviews or safeguarding assurance outcomes.

### **23.2 School-level monitoring**

Headteachers and DSLs must monitor how this policy is implemented in their school. This includes ensuring that colleagues understand reporting routes, CPOMS records are accurate and timely, safeguarding actions are followed up, training is completed, local arrangements are current, and safeguarding themes inform school improvement activity.

### **23.3 Trust assurance activity**

Trust assurance must distinguish between evidence that safeguarding activity has taken place and evidence that practice is effective. Assurance should consider whether concerns are identified early, records are timely and accurate, actions are completed, risks are reduced, pupils are supported, learning is embedded and unresolved risks are escalated.

Trust assurance activity may include:

- safeguarding assurance visits and school reviews;
- DSL supervision, network activity and professional support;
- CPOMS quality assurance and review of recording practice;
- single central record checks and safer recruitment assurance;
- training compliance monitoring;
- review of allegations, low-level concerns and adult-related safeguarding themes;
- attendance, persistent absence, children missing education and alternative provision oversight;
- online safety, filtering and monitoring assurance;
- review of safeguarding audits, action plans and school improvement priorities; and
- analysis of safeguarding themes, safeguarding risk, escalation activity and learning across the Trust.

### **23.4 Governance reporting**

The Trust Head of Safeguarding will provide safeguarding reports to senior leaders and trustees through the Trust's governance structure. Reporting will include safeguarding strengths, risks, compliance, assurance findings, trends, training, serious or emerging issues, progress against actions, unresolved risks, evidence of impact and recommendations for improvement. Advisory Boards will support local scrutiny of safeguarding implementation and review the school's School Safeguarding Local Arrangements Addendum.

### **23.5 School Safeguarding Local Arrangements Addendum review**

Each school must complete its School Safeguarding Local Arrangements Addendum before implementation from 1 September 2026. The addendum must then be reviewed at least annually and sooner where local contacts, DSL arrangements, referral routes, contextual safeguarding

concerns, filtering and monitoring arrangements, alternative provision, site arrangements or statutory requirements change. The Headteacher and DSL are responsible for ensuring the addendum remains accurate, is locally approved, is shared with colleagues and is available for Trust safeguarding assurance.

### **23.6 Continuous improvement**

Discovery Trust will use safeguarding learning to strengthen practice across schools. Learning may arise from audits, supervision, CPOMS reviews, allegations, low-level concerns, pupil voice, parent/carer feedback, attendance concerns, alternative provision reviews, online safety incidents, local or national reviews, inspection findings or changes in statutory guidance. Actions will be monitored through school-level and Trust assurance processes.

## **24. Linked Trust policies and documents**

This policy should be read alongside relevant Discovery Trust policies, procedures and guidance. These documents support safeguarding practice, professional conduct and operational decision-making, but do not replace the statutory safeguarding responsibilities set out in this policy. The following linked policies, procedures and guidance should be used alongside this policy:

Staff Code of Conduct  
Safer Recruitment Policy and recruitment procedures  
Managing Allegations Procedure  
Low-Level Concerns Procedure  
Whistleblowing Policy  
Online Safety Policy  
Behaviour Policy  
Anti-Bullying Policy  
Attendance Policy  
SEND Policy and accessibility arrangements  
Alternative Provision Procedure  
Educational Visits Policy and procedures  
Health and Safety Policy  
Lettings Policy and community use arrangements  
Data Protection Policy, records retention arrangements and information-sharing guidance  
Acceptable Use policies for pupils, colleagues and visitors  
Artificial Intelligence guidance and acceptable use expectations  
Relationships, Sex and Health Education curriculum documentation  
Intimate Care, medical needs, physical intervention and positive handling guidance where applicable  
Complaints Policy

Where there is any inconsistency between linked documents and this safeguarding policy, statutory safeguarding requirements and this policy take precedence. Leaders must seek advice from the Trust Head of Safeguarding, HR or the relevant senior leader where needed.

Cyber security, system access and information security arrangements must be treated as safeguarding matters where they affect pupil safety, safeguarding records, monitoring systems, personal data, image use, access controls or the Trust's ability to identify and respond to safeguarding risk.

## School Safeguarding Local Arrangements Addendum

This addendum must be completed by each Discovery Trust school and read alongside the Discovery Trust Safeguarding and Child Protection Policy 2026–2027. It records local safeguarding contacts, referral routes, contextual safeguarding concerns and site-specific arrangements. It must be reviewed at least annually and sooner where local arrangements change.

### **A. School details**

|                                       |  |
|---------------------------------------|--|
| <b>School name</b>                    |  |
| <b>Headteacher</b>                    |  |
| <b>School address</b>                 |  |
| <b>Main school telephone number</b>   |  |
| <b>Age range / phase</b>              |  |
| <b>Date addendum approved locally</b> |  |
| <b>Next review date</b>               |  |

### **B. Local safeguarding contacts**

| <b>Role</b>                                                            | <b>Name</b> | <b>Contact details</b> |
|------------------------------------------------------------------------|-------------|------------------------|
| Designated Safeguarding Lead                                           |             |                        |
| Deputy DSLs                                                            |             |                        |
| Designated teacher for looked-after and previously looked-after pupils |             |                        |
| SENCO                                                                  |             |                        |
| Safeguarding link Advisory Board member                                |             |                        |
| Chair of Advisory Board                                                |             |                        |
| School attendance lead                                                 |             |                        |
| Online safety / filtering and monitoring lead                          |             |                        |
| Out-of-hours safeguarding contact arrangements                         |             |                        |

### **C. Local authority and safeguarding partnership details**

| <b>Local arrangement</b>                                     | <b>Details to be completed by school</b> |
|--------------------------------------------------------------|------------------------------------------|
| Local safeguarding partnership                               |                                          |
| Children's social care referral route                        |                                          |
| Emergency duty team / out-of-hours route                     |                                          |
| LADO contact details                                         |                                          |
| Family help / early help arrangements                        |                                          |
| Prevent / Channel referral route                             |                                          |
| Police contact route for non-emergency safeguarding concerns |                                          |
| Local escalation / professional challenge route              |                                          |

### **D. Local contextual safeguarding concerns**

| <b>Area</b>                                                                       | <b>Local details, concerns or procedures</b> |
|-----------------------------------------------------------------------------------|----------------------------------------------|
| Key local safeguarding concerns                                                   |                                              |
| Exploitation concerns, including CCE, CSE, county lines or serious youth violence |                                              |
| Community safety concerns                                                         |                                              |

|                                                                   |  |
|-------------------------------------------------------------------|--|
| Online or social media trends affecting pupils                    |  |
| Transport, parks, shops, estates or other local places of concern |  |
| Local partnership responses                                       |  |

#### **E. School-specific safeguarding procedures**

| <b>Procedure</b>                                 | <b>Local arrangements</b> |
|--------------------------------------------------|---------------------------|
| How pupils report concerns                       |                           |
| How colleagues record concerns                   |                           |
| CPOMS categories or local recording expectations |                           |
| Internal safeguarding meeting arrangements       |                           |
| DSL supervision arrangements                     |                           |
| Pupil voice and safe reporting arrangements      |                           |

#### **F. Filtering, monitoring and online safety local arrangements**

| <b>Area</b>                                                                                                                                                                                                               | <b>Local arrangements</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| Filtering provider                                                                                                                                                                                                        |                           |
| Monitoring provider or process                                                                                                                                                                                            |                           |
| Who reviews alerts                                                                                                                                                                                                        |                           |
| Frequency of alert review and system checks<br>Evidence of annual review of filtering and monitoring, including coverage of web, app, image, video, audio, user-generated, dynamic, personalised and AI-generated content |                           |
| Local escalation process                                                                                                                                                                                                  |                           |
| Online safety education                                                                                                                                                                                                   |                           |
| Mobile and smart technology arrangements                                                                                                                                                                                  |                           |

#### **G. Alternative provision local arrangements**

| <b>Area</b>                                                                                                                                                                                         | <b>Local arrangements</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| Alternative provision currently used                                                                                                                                                                |                           |
| Pre-placement checks                                                                                                                                                                                |                           |
| Attendance monitoring arrangements                                                                                                                                                                  |                           |
| Named school lead for AP oversight<br>Minimum expectation: review at least half-termly, and more frequently where risk, attendance, SEND, safeguarding concern or placement instability requires it |                           |
| Frequency of review or visit                                                                                                                                                                        |                           |
| Information-sharing arrangements                                                                                                                                                                    |                           |
| Action if safeguarding concerns arise                                                                                                                                                               |                           |

#### **H. Site-specific and extended provision arrangements**

| <b>Area</b>                                                  | <b>Local arrangements</b> |
|--------------------------------------------------------------|---------------------------|
| Breakfast clubs, after-school clubs and wraparound provision |                           |
| Holiday clubs or extended provision                          |                           |
| Educational visits and residential trips                     |                           |
| Visitors and volunteers                                      |                           |

|                                                        |  |
|--------------------------------------------------------|--|
| Contractors                                            |  |
| Lettings and use of premises by external organisations |  |
| Site-specific supervision arrangements                 |  |
| Split-site, shared-site or transport arrangements      |  |

### **I. Annual confirmation**

| <b>Confirmation</b>                                               | <b>Yes / No / Notes</b> |
|-------------------------------------------------------------------|-------------------------|
| The addendum has been reviewed against the Trust policy.          |                         |
| Local contact details are accurate.                               |                         |
| DSL and deputy DSL details are published and visible in school.   |                         |
| Local safeguarding arrangements have been shared with colleagues. |                         |
| Headteacher signature and date                                    |                         |
| DSL signature and date                                            |                         |
| Advisory Board safeguarding link signature and date               |                         |

