Aspire Schools Safeguarding and Child Protection Policy

This policy was adopted	September 2026
Policy reviewed by	Executive Lead for Safeguarding To be ratified by Trustees: Autumn 2026
Updates since last version	Updates in line with KCSIE 2026 (sections 1, 8, 10); changes to Section 20 restrictive intervention in line with DfE guidance; minor date and name changes Addition of safeguarding separation to section 7
Review date	July 2027

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1. Purpose and context

The Aspire Schools trust believes that all children have a right to be and feel safe at home and at school, and we know that as providers of education we have a critical role to play in ensuring this happens. We are committed to ensuring that all children are and feel safe at school, and that we do everything we can to help ensure they are safe at home and in all other aspects of their life as well, including online.

The purpose of this policy is to outline the trust-wide commitments in respect of safeguarding and to outline the expectations of all of our schools.

Aspire Schools knows that children with SEND, and children who are in Alternative Provision settings, face additional safeguarding challenges. We train our staff so that they understand this too, and are equipped to deal with it. We acknowledge that children with SEND may face additional barriers to identifying abuse and neglect due to their presenting behaviours.

Through this policy, the trust intends for all our schools to:

- Provide an environment in which children and young people feel safe, secure, valued and respected
- Protect children from maltreatment, whether that is within or outside of the home, including online
- Provide an environment in which children and young people feel able to talk to a trusted adult if they do not feel safe
- Provide an environment in which children and young people are reassured that they are not creating a concern by reporting a problem
- Have systems in place for logging concerns and ensuring these are followed up on in a timely and appropriate manner
- Ensure that all Aspire Schools staff are aware of their responsibilities regarding safeguarding and have the skills and knowledge to adhere to these responsibilities
- Ensure that all Aspire Schools staff prevent the impairment of children's mental and physical health or development
- Ensure that all of our trust's schools have the training and resources that they need to deal with any concerns about children and young people's safety and wellbeing
- Ensure that of our Aspire Schools staff take action to enable all children to have the best outcomes
- Have systems in place for monitoring children who are known to be at risk of harm
- Ensure that all Aspire Schools staff provide help and support to meet the children's needs as soon as problems emerge
- Ensure that all of our trust's schools consider how to promote good wellbeing and enable students to know how to keep safe through the curriculum offer.
- Have systems in place for monitoring the quality and effectiveness of our safeguarding policies and practices
- Adhere to safer recruitment practices and policies.
- Maintain records of low-level concerns and ensure that these are acted upon appropriately.

This policy reflects statutory requirements and guidance as to best practice in safeguarding, including (but not limited to):

- DfE Keeping Children Safe in Education [September 2026]
- Working Together to Safeguard Children [March 2026]
- The Children Act 1989 and 2004 Amendment

- The Education Act 2002
- The Safeguarding Vulnerable Groups Act 2006
- The Prevent Duty Guidance [2023]
- The Equality Act 2010
- The United Nations Convention on the Rights of the Child (UNCRC)
- The Trust's Funding Agreement and Articles of Association.
- **PACE Code C 2023 (accessible) - GOV.UK (www.gov.uk)**

2. Definitions

Safeguarding: the umbrella term for everything that we do to support children and young people to keep them safe and promote their welfare. Keeping Children Safe in Education 2026 and Working Together to Safeguard Children, March 2026, defines safeguarding as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework:
    - Outcome 1: Children, young people and families stay together and get the help they need
    - Outcome 2: Children and young people are safe in and outside their home
    - Outcome 3: Children and young people are supported by their family network
    - Outcome 4: Children in care and care leavers have stable, loving homes

Child Protection: the activity to protect specific children who are suffering, or likely to suffer, significant harm.

3. Roles and responsibilities

*Safeguarding and promoting the welfare of children is **everyone's** responsibility. 'Children' means everyone under the age of 18. In order to fulfil this responsibility effectively, **all practitioner** should make sure their approach is **child centred**. This means that they should consider, at all times, what is in the best interests of the child.*

*No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.*

From KCSIE 2026

All staff are responsible for:

- Having read and understood KCSIE part 1 and this policy

- Following this policy
- Providing a safe and nurturing experience for the children and young people in our care and ensuring that they feel safe to raise any concerns that they may have
- Paying close attention to the children in our care, noting any reasons to be concerned, and logging these in the appropriate way, especially children and young people with SEND
- Ensuring that they always consider the safety and wellbeing of children while at work and in all aspects of their role and act in way that promotes the safety and wellbeing of all pupils in line with the Aspire Schools values of Safe, Love, Learn.

Trustees and the CEO are responsible for:

- Completing regular and appropriate safeguarding training
- Providing appropriate challenge and support to the Headteachers and Heads of Schools
- Appointing a link trustee with specific responsibility for Safeguarding who works with the Trust's **Executive Lead for Safeguarding** and senior leaders to quality-assure safeguarding practices
- Managing any allegations against the CEO or Headteachers.

The Board of Trustees must have assurance that any alternative provision attended by children on roll has appropriate safeguarding arrangements and child protection policies in place. The Board of Trustees must ensure that any children, at such a provision, are visited whilst they are attending, that the curriculum is appropriate to the needs of the child and that attendance is monitored daily.

Any outside agencies providing services or activities to the school have provided assurances that they have safeguarding policies and procedures in place.

The Headteachers/Executive Lead for Safeguarding are responsible for:

- The strategic leadership of safeguarding across the trust's schools
- Ensuring that this safeguarding policy is followed across the trust's schools
- Quality Assurance of Safeguarding practices across the trust's schools including the use of Safeguarding Risk Assessments for Student Welfare where risk have been identified
- Offering day to day support, guidance and advice to the DSLs as necessary
- Ensuring that staff are appropriately trained across each school and service
- Reporting to the Trustees as to the quality and effectiveness of safeguarding practices
- Ensuring that all recruitment practices adhere to safeguarding best practice
- Holding a regular meeting to share updates and good practice with DSLs across the trust
- Meeting with Trustees as required
- Auditing the trust's schools once a year and reporting to the CEO and Trustees
- Monitoring the implementation and effectiveness of the Safeguarding Risk Assessment Policy for Student Welfare
- Monitoring the use of the Safeguarding Risk Assessments for Student Welfare
- Liaising with the LADO in the event of an allegation being made against a member of the staff, volunteer or an organisation using the school premises
- Ensuring that a designated 'Appropriate Adult' is in place in order to support children in line with the Police and Criminal Evidence (PACE) act.

The Designated Safeguarding Lead (usually the Head of School) is responsible for:

- Ensuring that this safeguarding policy is followed within their school site
- Quality Assurance of Safeguarding practices within their school site
- Using the half termly safeguarding updates to ensuring that staff are appropriately trained across each school site

- Ensuring that their own training is up to date
- Promoting the importance of safeguarding throughout the school
- Offering day to day support to the deputy DSLs across their school
- Ensuring that appropriate cover is provided in the absence of the DSL
- Ensuring that all concerns raised are followed up on appropriately and in a timely fashion
- Leading the DSL Welfare Team within their school site
- Ensuring that all school practices (e.g. behaviour management, trips and visits, the use of restraint etc) adhere to Safeguarding Risk Assessment Policy for Student Welfare
- Meeting with Trustees as required
- Regularly monitoring students to spot any trends or patterns.
- Working through the Safeguarding Risk Assessment Policy for Student Welfare where risk have been identified
- Authorising the Safeguarding Risk Assessment for Student Welfare and uploading and pinning to Pastoral Notes on Arbor
- Looking after their own and the DSL team's wellbeing by accessing the clinical supervision made available by Aspire Schools.

The Deputy Designated Safeguarding Leads (Deputy Heads of School and members of the Learner Support Team) are responsible for:

- Supporting the DSL with following up on safeguarding concerns
- Supporting the DSL to work through the Safeguarding Risk Assessment Policy for Student Welfare where risk have been identified.
- Attending safeguarding and child protection-related meetings on behalf of the school or service, collating information for these meetings from staff, representing the school/service accurately, taking comprehensive notes and ensuring these are logged appropriately
- Look after their wellbeing by attending group clinical supervision provided by Aspire Schools.

The IT manager is responsible for:

- Implementing systems in line with KCSIE to ensure students are safe when accessing the internet from a school or on an Aspire Schools device
- Ensuring Aspire Schools' filtering provider is signed up to relevant lists (CSA content, sexual content, terrorist content)
- Reporting to the CEO and trustees on this.

2026-2027 Safeguarding Team

Safeguarding Trustee: Mark Shaw
Executive Lead for Safeguarding: Polly Kempson
Trust Lead for Behaviour Management and Student Support: Kate Baptiste

DSL team (Lead DSL in bold):

Blueprint	CSEC	The Wycombe Grange	Shortenills Forest	Shortenills Abbey	Shortenills House
Interim Headteacher of AP: Jess Robinson			**Headteacher of Shortenills:** Jake Brindley		
Jess Robinson	**Polly Kempson**	**Mark Collins (Interim)**	**Liz Wolfenden**	**Jo Hodge**	**Anna Newbold**
Sarah Hassell	Tracie Thompson	Jessica Walker	Nat Griffiths	Sharon Barnes	**Rebecca Brooks**
Aimee Dean	Bryony Russell		Hannah Driscoll		Mandy Miller
	Mickey Giannetti				Rachel Bennett

4. Visitors

All visitors to schools must:

- Sign in at reception and be given a visitor's badge
- Given a safeguarding leaflet to read before entering the building
- Be always accompanied by a member of staff, unless a letter of assurance has been obtained from their line manager and they are recorded on the Single Central Register

If visitors are going to be visiting the school regularly, such as youth workers etc, a letter of assurance will be obtained and it will be recorded on the Single Central Register.

(See Aspire Schools Signing in Process for more details).

5. Student information for safeguarding

It is the responsibility of the Admissions Officer to ensure that the following information is in place before students start at Aspire Schools, to ensure that we can keep them safe while they are on Aspire Schools' premises.

- Before starting on site, all students must have a completed risk assessment with information from the referring school or service. See Appendix 4 of the Safeguarding Risk Assessment Policy for Student Welfare
- Before starting on site, the Admissions Officer must check the CTF file for any medical information, and if there is an alert, must contact the school or family for more information about this medical problem. Full information must be placed on Arbor and the relevant

Head of School or service must be alerted

- Before starting on site, the Admissions Officer must ensure we have a verbal safeguarding report from the previous school or service, or from a professional that knows the student and their family. This should be logged on CPOMS and the Head of School alerted before the child starts
- Within five days of starting on site, the Admissions Officer must ensure that the trust's school has a copy of the student's safeguarding file. These should be transferred via CPOMS if possible or an electronic copy obtained via secure e-mail and saved on CPOMS. The Head of School will be alerted.
- All students must have at least two identified emergency contacts.

When students leave us, we will pass all safeguarding records on to their new school within five days. These will be sent via CPOMS if possible, or downloaded and sent securely by email to the DSL at the new school. An email receipt will be requested, and this will be added to the CPOMs record. (See Aspire Schools Transfer of Safeguarding Files for more details)

If students leave us and do not move on to another education provision, we become the last statutory school that they attend. In this case, we must keep their records until the pupil reaches the age of 25.

6. Attendance concerns and safeguarding

Through our attendance policy, we have a robust system for monitoring attendance and ensuring that we take swift action to find out where pupils are when they are not in school, and to check that they are safe and well. Please see the Attendance Policy for more information. The key safeguarding elements of this policy are:

- Absence calls made by site administrators before 10am when students are absent to ensure that they are at home with parents or carers
- Any absence of a child or young person who has a CIN or CP plan will be reported immediately to the social worker or other relevant professionals
- If we have not seen or heard from a child or young person or their family for three consecutive days, staff will do a home visit or hold a video call to ensure they are safe and well
- Staff understand the link between poor attendance and increased safeguarding risks and monitor students with low attendance via CPOMS.

Any pupil who is absent for ten school days and for whom we have not been able to contact parents or carers, will be reported as a Child Absent from Education to the Children Missing Education Officer.

7. In the case of a safeguarding concern about a student

All trust staff must be conscious of the wide range of harms that may occur to our students: harms from their family and extra-familial harms (including school and other institutions and/or agencies a child interacts with, their local community, online etc). Abuse can be, but is not limited to, psychological, physical, sexual, financial, emotional or neglect. Children can be victims of domestic abuse, they may witness domestic abuse, or may suffer domestic abuse in their own intimate relationships (teenage relationship abuse). It is important to recognise that children with SEND are

at an increased risk of safeguarding harm and that it may present differently due to their specific learning disabilities.

In the case that a member of staff has a safeguarding concern about a student, the following must happen:

1. If there has been a disclosure, the member of staff must:
    a. Do what they can to reassure the child or young person and ensure that they feel safe and that they will be heard.
    b. Avoid using the language of "victim" and/or "perpetrator" as not everyone who has been subjected to abuse considers themselves a victim, in some cases the behaviour will have been harmful to both parties
    c. Not promise confidentiality and explain that information putting them at risk must be shared to keep them safe
    d. Not ask leading questions
    e. Talk to the child or young person about what is going to happen next, listen to their view on how that should happen and adhere to that where possible and appropriate.
    f. Make notes about what has been said as soon after the discussion as possible to ensure accuracy.
    g. If the disclosure concerns a member of Aspire Schools staff, report this immediately in person to the Head of School. If they are not available this should be reported to the Headteacher, Executive Lead for Safeguarding, or to the HR Manager.
        i. If the concern is about the Head of School, this must be reported to the Headteacher or HR Manager
        ii. If the concern is about the Headteacher, this must be reported to the CEO.
        iii. If the concern is about the CEO this must be reported to the Chair of Trustees.
        iv. If the concern is about the Chair of Trustees this must be reported to the CEO.

2. The member of staff must log their concern:
    a. On CPOMS, alerting the lead DSL, as soon as is practicable and at least at the end of the school day
    b. If the concern is such that it may need to be dealt with urgently, for example there is a chance that a student is at risk by going home the member of staff must find a member of the DSL team and talk to them in person.

3. The DSL must take appropriate action to follow up (or delegate this to a Deputy DSL). This could be:
    a. No further action required – if for example the concern has already been noted and explored, or is already being dealt with, or the concern is not actually a safeguarding concern
    b. Finding out more information – if for example it is not clear whether there is a real safeguarding concern, or it is not clear how significant a concern it is
    c. Taking action to safeguard the student – for example speaking to the student or parents/carers, other involved professionals such as a social worker or youth worker, or making a MARF (Multi Agency Referral Form). If a referral is being made, the DSL will share this with the parents/carers, unless it is their professional judgement that doing so would put the child at increased risk of harm.

If there is an immediate risk of harm, the DSL will ring 999 immediately. The DSL will then contact the first response team at Buckinghamshire Safeguarding Children Partnership to report the incident, alert the social services team as appropriate before following up with a MARF.

The DSL or Deputy DSL must keep accurate and complete records of actions taken in response to this concern on CPOMS.

In the case that the DSL believes further action is required, they will adhere to the thresholds and systems for referral outlined by Buckinghamshire Safeguarding Children Partnership (BSCP) as described here: Continuum of Need.

7.1 Children with SEND

At Aspire Schools, we consider all our students as children with SEND. We are aware of the additional safeguarding challenges children with SEND can face and the potential barriers to identifying abuse and neglect in this group of children.

This might include:

- assumptions that indicators of abuse such as behaviour, mood and injury relate to the child or young person's disability without further exploration.
- The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- communication barriers and difficulties in overcoming these barriers.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

7.2 Safeguarding separation plans

Where a safeguarding concern indicates that contact between students may present a risk of harm, the Designated Safeguarding Lead (DSL) will consider whether a safeguarding separation plan is required.

A safeguarding separation plan is a protective safeguarding measure intended to reduce identified risks and support the safety, welfare and educational progress of all students involved.

The plan may include:

- arrangements for movement around the school site;
- separate social times or break arrangements;
- amended transport arrangements;
- supervision requirements;
- arrangements relating to lessons, enrichment activities and educational visits;
- restrictions on direct or indirect contact where necessary.

All safeguarding separation plans will be informed by an appropriate risk assessment and reviewed regularly by the DSL or Deputy DSL.

The DSL Welfare Team will set threshold levels for all students and monitor incidents on a weekly basis to spot any trends and be able to intervene as early as possible, so that early help and support can prevent any escalation of harm, or risk of harm, to our students.

- Where risks to a student's wellbeing is identified, DSLs will use the Risk Assessment for Student Wellbeing to investigate risks and put mitigations in place as far as possible.
- DSLs will share information/ actions from the Risk Assessment for Student Wellbeing with external agencies when appropriate.

The voice of the child or young person and the family needs to be involved at all times, unless it has been assessed that this will pose a risk to the child or young person, when deciding how to manage safeguarding issues. Aspire Schools' Family Liaison Officers build relationships with families to support this process.

8. In the case of a safeguarding concern about a member of staff

- All staff have a responsibility to report any concerns that they might have about other members of staff, including supply teachers, volunteers, or contractors however trivial it may seem. Even the most low-level concerns about staff behaviour must be dealt with under this process.
- Aspire Schools encourages staff to self-refer if they find themselves in a situation that could be misinterpreted.
- All reports will be handled in a responsive, sensitive, and proportionate way.
- Unprofessional behaviour will be addressed, and the staff member supported to correct it, at an early stage.

This creates and embeds a culture of openness, trust, and transparency in which our values and expected behaviours are constantly lived, monitored and reinforced by all staff, while minimising the risk of abuse.
Our procedures for dealing with allegations will be applied with common sense and judgement.

If a staff member witnesses behaviour that gives any rise to concern, they must:

- Report it on the same day to the Head of School. If the concern relates to the Head of School it should be reported to the Headteacher or HR Manager.
- The Head of School will log the incident on Staff Safe and alert the Executive Lead for Safeguarding, Headteacher, or the HR Manager.
- The Headteacher, HR Manager and/or Executive Lead for Safeguarding will decide if the behaviour meets the **threshold for harm** or if it will be recorded as a **low-level concern**.

Please see Staff Code of Conduct for further detail.

Behaviour that indicates that the **threshold for harm has been met**:

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

A low-level concern
This is a behaviour towards a child by a member of staff that does not meet the harm threshold, but is inconsistent with the staff code of conduct, and may be causing a sense of unease or a 'nagging doubt'. For example, this may include:

- Being over-friendly with children
- Having favourites
- Taking photographs of children on a personal device
- Engaging in 1-to-1 activities where they can't easily be seen
- Humiliating pupils

- Accessing a personal phone in the classrooms or spaces shared with pupils.

Heads of School do not make the decision about whether a behaviour meets the threshold for harm, that decision will be made by the Headteacher, HR Manager and Executive Lead for Safeguarding. Even 'nagging doubts' must be logged on Staff Safe.

If the threshold for harm is met, the Headteacher (or CEO or Chair of Trustees, in the case that the concern is regarding the Headteacher) will:

- Take advice from the Trust's HR Manager
- Take advice from the LADO if required
- Meet with the member of staff involved, share the concern with them, and either suspend them or ask them to work from home during the investigation if the concern is of a significant enough level
- Investigate further if appropriate, sharing the results of that investigation with the HR Manager and the Trust CEO
- Report to the LADO if appropriate
- Take any follow up action with the member of staff as agreed with the HR Manager and the CEO
- Report to the police or DfE if appropriate.

Records of low-level concerns and investigations will be maintained by HR in a confidential and secure manner, in accordance with Aspire Schools Data Protection Policy.

9. Supporting staff who deal with safeguarding concerns

The Aspire Schools trust recognise that there is a real risk of secondary trauma for staff who work in Safeguarding in Alternative Provision settings. The trust has several support mechanisms available for these staff:

- Externally facilitated group supervision for the DSL Team at each site
- Externally facilitated 1:1 supervision for Heads of School and Family Liaison Officers
- Support from line managers within the normal line management systems
- Support from senior staff, as per the roles and responsibilities outlined above

(See Aspire Schools Clinical Supervision Procedure for more details).

10. Early Help - including information regarding Early Help in the community

The Aspire Schools trust is committed to securing early help and intervention for our children and families so that everyone is supported as best they can be, and the chances of harm for our young people is reduced as far as is possible.

At Aspire Schools, we understand that the following factors increase a child's vulnerability and makes them more likely to need support before statutory intervention, including from universal services and community-based Early Help or targeted Early Help:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need

- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.
- has English as an additional language (EAL)

The Risk Assessment for Student Wellbeing proforma will be used to consider all the risk factors for an individual child and can be used to plan the appropriate action and/or to support a referral for Early Help.

The views of the child or young person and their family will be sought and taken into account when considering the best way of supporting children or young people at risk from safeguarding harm.

10.1 Community-based Early Help assessment

If children do not require the support of statutory children's services, the DSL or DDSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children.

Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including Section 17.

Early help in Buckinghamshire is provided by the Family Support Service:
https://familyinfo.buckinghamshire.gov.uk/familysupport/

Our DSLs and Deputy DSLs will work with families and students to request support for them if needed, with their consent (see section on information sharing below). The following link can be used to request support for young people or their families: https://buckinghamshire-dash.achieveservice.com/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-e4b0523f-bd09-4703-a8c5-08a20fa42329/AF-Stage-8bbb28be-add0-434f-8c2e-a73a98a9f524/definition.json&redirectlink=/en&cancelRedirectLink=/en&consentMessage=yes

11. The Prevent Duty

The Aspire Schools trust is aware of our obligations under the Prevent Duty to prevent young people from being drawn into terrorism and extremist behaviour. We consider this duty as part of our wider commitment to safeguarding, and any concerns that children or young people are at risk of radicalisation will be dealt with under our normal systems for logging and responding to safeguarding concerns, as outlined above.

All Aspire Schools staff will complete Prevent training, annually. Our DSL network will share information regarding the types of radicalisation that our students are most vulnerable to, which include right wing radicalisation and extreme misogyny.

Aspire Schools has systems and processes in place regarding our IT systems so that students cannot view extremist material, and so that we are alerted if children attempt to do so.

12. Child-on-child (peer-on-peer) abuse, sexual violence and harmful sexual behaviours

The Aspire Schools trust recognises the need to respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school. We recognise the potentially criminal level of such abuse, and do not consider it "banter" or "just growing up." There is a zero-tolerance approach to sexual violence and sexual harassment and all victims will be reassured that they are being taken seriously and that they will be supported and kept safe.

All Aspire Schools staff maintain an attitude of 'it could happen here' and look out for the indicators of abuse. They understand that this is especially important when considering child-on-child abuse.

At Aspire Schools, we recognise and understand the scale of harassment and abuse likely to be present with in our school community and know that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. Our reactive PSHE curriculum is used to challenge incidence of sexual violence and sexual harassment to ensure that it does not become normalised behaviour.

It is more likely girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with SEND are also three times more likely to be abused than their peers.

Child-on-child (peer-on-peer) abuse could include, but is not limited to:

- Bullying, which can be face to face or online bullying
- Prejudiced abuse, targeted at someone because of their gender, sexuality, race, ethnic background, disability, etc.
- Sexual violence, in the context of intimate personal relationships between peers. It is important to recognise that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. This may take place within school or outside of school
- Sexual harassment, including sending uninvited sexual texts (sexting) or images, or requesting such images and 'Up skirting' or taking non-consensual photographs or videos of peers.

The importance of protecting against child-on-child abuse features in our annual safeguarding refresher training for all staff, so that they are all aware of our obligations to notice and deal with any such abuse and feel skilled and empowered to do so.

Concerns or allegations of child-on-child abuse will be logged and responded to as safeguarding concerns as outlined in section 7.

A risk assessment will be put in place to support both the 'victim' and 'perpetrator'.

We will signpost to external agencies where appropriate for targeted support (e,g Brooks sexual health service).

We are aware that children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and distressing. This is likely to adversely affect their education and they may need extra support.

To minimise the risk of child-on-child abuse, schools will:

- Include lessons on child-on-child abuse within the PSHE curriculum
- Challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- Ensure all staff challenge any occurrence or discussion of child-on-child abuse publicly
- Treat concerns of child-on-child abuse as a safeguarding concern as well as a potential criminal offence, and work with everyone involved accordingly
- Respond to any incidence of child-on-child abuse by fully assessing the risks and working to mitigate identified risks. (See Risk Assessment Policy for Student Welfare).

If we feel that a student is in risk of immediate harm, we will dial 999 and report it to the police.

When working with young children it is important to understand the law around consent:

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16.
- sexual intercourse without consent is rape.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to~~o~~ inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context. We are aware that children displaying HSB have often experienced their own abuse and trauma.

13. Child criminal exploitation

Children are victims first

It is often the case that children do not perceive themselves to be victims, as they consider they have acted voluntarily or that the exploiter is their friend. Child-on-child exploitation is commonplace and often unrecognised as exploitation by the victim. The reality is that their behaviour is not voluntary or consenting, and every child in this situation needs to be considered a victim first.

Child exploitation can take many forms, including, but not limited to:

- **Grooming** is when someone gets close to a child in order to abuse them. This can happen online or face-to-face, and it can be done by strangers or someone familiar. Groomers will hide their true intentions and may spend a long time gaining the child's trust before the abuse starts.
- **Sexual exploitation** is when boys or girls are tricked or forced into performing sexual acts, possibly with multiple perpetrators of abuse. They might receive gifts, money or affection, be given alcohol or drugs, or be tricked into believing they are in a consensual relationship.
- **Criminal exploitation** is when young people are forced to commit crimes that benefit the exploiter. They might be forced to beg, to steal, to sell pirate DVDs, or to grow or deal drugs. 'County Lines' is when gangs and drug dealers use children to transport and sell drugs across the country, using 'county line' mobile phone numbers for different regions.
- **Forced or child marriage** is when a young person is forced to marry against their will. It can be a form of modern slavery as the young person is treated as something to be traded, and then used for sex and housework.
- **Domestic servitude** is when a child is confined to a home to do housework such as cooking, cleaning, and childcare.
- **Forced labour** is when a young person is forced to work for little or no money. It could happen anywhere, but the commonly reported places are car washes, nail bars, restaurants or takeaways, building sites and farms.

The children and young people in our schools are often at increased risk of being targeted. Note that although older children are more likely to be targeted, children in primary school have been targeted too.

Staff at Aspire Schools must remain vigilant in looking out for signs of CCE:

- Being frightened of some people, places or situations
- Increasing secrecy
- Sharp changes in mood or character
- Having money or things that cannot be explained
- Physical signs of abuse (bruises, cuts, injuries without an explanation)
- Sexually transmitted infections
- Increase in missing episodes
- Substance misuse
- Increase in travel in/outside of the County
- Significantly older peers
- Meeting people in person that they have only spoken to online
- Seen getting into/out of vehicles that you do not know

Remember that even though the number of boys involved in CCE is higher than the number of girls, however it can also affect girls.

Where we suspect that child exploitation is at risk of taking place, we report through the Buckinghamshire Safeguarding Children Partnership: Child Exploitation.

14. FGM and "honour-based" violence

The Aspire Schools trust is aware of our legal duty to report known cases of Female Genital Mutilation and/or so-called "honour-based" violence to the police. Aspire Schools understands that

this may happen to both male and female students and include training on this matter in our annual safeguarding refresher for all staff.

If staff have a concern of this nature they should discuss it with the DSL, who will support them to report this to the police.

If we feel that a student is in risk of immediate harm, we will dial 999 and report it to the police.

15. Online safety

The Aspire School trust is committed to ensuring that:

- Our schools have systems in place to prevent young people using the internet in dangerous ways whilst at school
- The education that we provide helps young people learn about the risks of their online activities and supports them to make safer choices
- All staff are aware of their responsibility to understand the filtering and monitoring systems in place and report any breaches without delay
- All staff will be aware of what their students are accessing during lessons
- Aspire staff understand how to support students who experience sexual violence and sexual harassment online.
- All staff understand that misinformation, disinformation and conspiracy theories are safeguarding harms, as students may be easily persuaded to believe ideas that could increase their vulnerability to be radicalised.
- All staff understand the importance of monitoring AI generated material carefully and the importance of teaching students to critically assess information that they have read on-line.

Aspire Schools' systems to protect students while using the internet in school include:

- **Smoothwall**: this service monitors all activity on our Student/Staff IT devices, and uses software to detect any threats in any language or images. If intervention is required, the incident is escalated to our DSLs.
    - A screen shot captures the incident
    - The user ID, machine name, time, date and IP address are recorded
    - Behaviour Analysts review the incident to determine if it requires intervention (or not)
    - Illegal and life-threatening incidents will be reported to the site DSL immediately, by phone
    - Incidents that require intervention are documented in an encrypted report that's emailed to the school's nominated contacts.

- **Internet filtering:** Internet access at all school sites is filtered by Buckinghamshire Council's filtering server Netsweeper. This service provides real-time analysis, filtering and blocking of online content to protect students.

- **User agreement**: Students discuss and sign an online safety agreement as part of their induction to the school. Our PSHE curriculum includes topics on internet use and online safety. Staff using the internet as part of other curriculum lessons will also discuss this, repeating key messages.

Any safeguarding concerns that are raised as part of the Smoothwall monitoring process are logged in CPOMS and dealt with by the DSL as outlined in section 7.

If an incident involving nudes and semi-nudes comes to the attention of any member of staff in the Aspire Schools trust:

- the incident should be referred to the DSL as soon as possible
- the DSL should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the leadership team who deal with safeguarding concerns
- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

If a child or young person has experienced sexual violence or sexual harassment online, DSLs are aware that there are outside agencies that can support, such as:

- The UK Safer Internet Centre
- Internet Watch Foundation
- Childline/IWF
- UKCIS Sharing nudes and semi-nudes advice
- National Crime agency

Staff are aware that children and young people with SEND may need additional help around keeping safe online. Resources and information aimed for Students with additional needs are included within the PSHE curriculum delivery.

16. Concerns about students' mental health

As an setting for students with Social, Emotional and Mental Health difficulties, a greater proportion of our students will experience mental health difficulties than in mainstream settings. We are aware of the additional risk factors that this may give when considering the safeguarding risks for a child or young person.

If you have a concern about a student's mental health, speak to your Head of School or the Headteacher. We work with closely with CAHMS to support our children's mental health.

17. Recruitment

The Aspire Schools trust follows safer recruitment guidelines and best practice as part of all recruitment.

When recruiting new permanent staff members:

- We only accept application forms, not CVs
- We take references before candidates attend an Aspire site for an interview, where feasible
- We ensure that we have a reference from the current or most recent employer
- We complete pre-employment checks and DBS checks before a member of staff starts with us

- We do a basic search of social media for candidates as part of shortlisting. We make applicants aware that we will be doing this by including this on the application form, and use a matrix to make clear the parameters of what we are searching for to ensure consistency
- We ask for a declaration in relation to the application of the Childcare (Disqualification) Regulations 2018 and the Childcare Act 2006 in schools
- All offers of employment are made subject to satisfactory references and safeguarding checks.

When working with agencies for supply staff:

- Our HR team request confirmation of safeguarding checks and details of references before the supply staff starts onsite
- Our Site Administrator checks with HR that these checks were satisfactory before admitting the supply staff into the building.

When working with volunteers:

- We take references and do a DBS check before a volunteer starts with us.

18. The Buckinghamshire Local Children's Safeguarding Partnership

The Aspire Schools trust works in close collaboration with the Buckinghamshire Children's Safeguarding Partnership (BSCP). This includes, but is not limited to:

- Training our DSLs and Deputy DSLs through BSCP
- Using BCSP early intervention and early help strategies and support systems
- Following agreed BSCP ways of working when referring and escalating cases
- Engaging with peer audits and challenge visits
- Communicating with the LADO when appropriate as described above.

More information about BCSP can be found here
https://www.buckssafeguarding.org.uk/childrenpartnership/about-the-bscp/

19. Aspire Schools' approach to information sharing

The Aspire Schools trust follows information sharing guidelines from BCSP, available here: https://www.buckssafeguarding.org.uk/childrenpartnership/professionals/information-sharing-consent/.
This includes the following guidance:

- *Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.*
- *Be open and honest from the outset about WHY, WHAT & HOW and WITH WHOM information will, or could be shared, and seek their agreement unless it is unsafe or inappropriate to do so.*
- *Seek advice if you are in any doubt, without disclosing the identity of the person where possible.*
- *Share with consent where appropriate and where possible, respect the wishes of those who do not consent. You may still share information without consent if, in your judgement, lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.*

- *Consider safety and wellbeing: base your information sharing decisions on considerations of the safety and wellbeing of the person and others who may be affected by their actions.*
- *Necessary, proportionate, relevant, accurate, timely and secure: ensure that the information you share is necessary for the purpose in which you are sharing it. Ensure it is shared only with those people who need to have it. It is accurate and up-to date and is shared securely and in a timely fashion.*
- *Keep a record of your decision and reasons for it- whether it is to share information or not. If you decide to share then record what you have shared, with whom, and why.*

We start from the basic principle that we will always seek to discuss our concerns with a student or parent before making a referral, and get consent to share information with other professionals, unless one of the following criteria, outlined by BSCP, are met:

- When a child is believed to be at risk of significant harm
- When the public interest in safeguarding the child's welfare overrides the need to keep the information confidential
- For the prevention, detection, or prosecution of a serious crime
- When instructed to do so by a court
- When there is a legal obligation
- When it is in the parent, carer, or young person's vital interest to do so.

20. Aspire Schools' approach to restrictive interventions

The Aspire Schools trust is committed to an approach to behaviour that is based on respect and kindness, as outlined in our Behaviour Regulation and Relationships Policy. We are committed to our responsibility to keep all students and staff safe from harm. Occasionally, a restrictive intervention, including the use of reasonable force, is necessary and lawful to maintain safety, prevent injury, prevent serious damage to property, or to prevent a criminal act.

Aspire Schools recognise that restrictive interventions should always be a last resort and only be used where all appropriate preventative and de-escalation strategies have been considered or attempted, unless there is an immediate risk of harm. Our approach to this is included in our Behaviour Regulation and Relationships Policy.

The key factors as relate to safeguarding are:

- All relevant staff are trained in Team Teach and are expected to do the full 12-hour course which is recommended for staff in AP settings. We put on annual training, and staff who start mid-year and have not been trained are not allowed to use Team Teach techniques
- Our recruitment processes for relevant roles include questions on attitudes to restraint and the use of restrictive interventions so that we recruit people who know they may be necessary, are prepared to use these techniques where required, but who recognise the extreme circumstances in which that might be
- All relevant staff are also trained in a wide range of de-escalation techniques, so that we reduce the need to use restrictive interventions except when necessary to keep students from harming themselves or other students. We do not use restrictive interventions for any other purpose, e.g. for compliance or to prevent damage to property
- Staff will continually assess whether the intervention remains necessary and will end it immediately once the risk has reduced sufficiently
- All students have an individual risk assessment, that supports staff to manage them and their behaviour and reduce or eliminate the need for restrictive intervention and where students are known to present behaviours that may require restrictive intervention,

individual support plans and risk assessment will identify preventative strategies, de-escalation approaches, preferred interventions and post incident support

- If a restrictive intervention is used, appropriate support will be given after the incident. The student's wellbeing and any injuries or concerns will be checked and there will be a restorative and reflective session afterwards with the student, where appropriate, once they have returned to a regulated state. The incident will be reviewed to identify learning and opportunities to reduce the likelihood of recurrence
- If a restrictive intervention is used, the Head of School will ensure that parents/carers are contacted by an appropriate person, ideally before the student returns home
- We have a detailed reflection session after any use of a restrictive intervention which includes making plans to prevent the need to use a restrictive intervention with a student again
- We keep records of all team teach incidents on Arbor and CPOMS. These are reviewed as part of our Safeguarding Audits
- Numbers of restrictive interventions are recorded and reflected on termly as part of our self-evaluation systems and reported to Trustees bi-annually.

21. Operation Encompass

Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse. Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar. Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

Operation Encompass means that the police will share information with us about **all** police attended Domestic Abuse incidents which involve any of our children PRIOR to the start of the next school day. The notification informs us about the context of the incident and includes the Voice of the Child.

Once a Key Adult (DSL) and their deputy/ies (DDSLs) have attended either an Operation Encompass briefing or have completed the free National Online Operation Encompass Key Adult training, they will cascade the principles of Operation Encompass to all other staff.

Our parents are fully aware that we are an Operation Encompass school and we ensure that when a new child joins our school, the parents/carers are informed about Operation Encompass.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information. The Key Adult(s) have led training for all staff and Trustees about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children.

The Safeguarding Trustee will report on Operation Encompass in the termly report to Trustees. All information is anonymised for these reports.

We have used the Operation Encompass Key Adult Responsibilities checklist to ensure that all appropriate actions have been taken by the school.

When a Head of School, DSL or DDSL leave the school and other staff are appointed, they will ensure that all Operation Encompass log in details are shared with the new Head of School or Key Adult and that the new member of staff will undertake the Operation Encompass online training.

22. Related policies

This policy should be read in conjunction with the following Aspire policies:

- Risk Assessment for Student Welfare policy
- Absconding (Students who abscond or go missing) policy
- Staff Code of Conduct