



EMMANUEL
SCHOOLS FOUNDATION

Safeguarding and Child Protection

Policy 2025/26



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Approved by Trustees: October 2025

This page is localized to **Grace College**

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This policy is to be read in conjunction with:

- ESF Staff code of conduct
- ESF Behaviour Policy
- ESF Child-on-Child Abuse Policy
- School SEND policy
- ESF E-Safety policy
- ESF CCTV Policy
- ESF Whistleblowing Policy
- ESF Records Management and Retention Policy

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1. Definitions and Scope

The policy applies to all staff, governors and volunteers and reflects the current statutory guidance provided by the Department for Education (DfE) and local guidance issued by our partner Local Authority (see table above). These duties are set out in the Education Act 2002 Section 175, working together to safeguard children, and Keeping Children Safe in Education (2025) (KCISE)

1.1 Safeguarding

Safeguarding is the action taken to promote the welfare of children and protect them from harm. It includes protecting children from maltreatment; preventing impairment of health or development; ensuring children grow up in safe and effective care; and taking action to enable all children to have the best outcomes. Child protection is a subset of safeguarding focused on protecting children who have suffered or are at risk of significant harm.

1.2 Abuse and Neglect

Abuse can be physical, emotional, sexual, or neglect. Children may experience multiple, overlapping harms including:

- Child sexual exploitation (CSE) / child criminal exploitation (CCE)
- Online harm and image-based abuse
- Serious violence / gang involvement / county lines
- Radicalisation and extremism
- 'Honour' or faith-based abuse, forced marriage, female genital mutilation (FGM)
- Trafficking and modern slavery
- Child-on-child abuse, incl. sexual harassment/violence and harmful sexual behaviour

1.3 Contextual Safeguarding (Extra-Familial Harm)

Risk can arise in peer groups, neighbourhoods, online spaces, transport routes, and community settings. Emmanuel Schools Foundation assesses and addresses risks beyond the family, working with partners to disrupt harmful contexts.

2. Aims of the Policy

1. To safeguard and promote the welfare of all pupils across Emmanuel Schools Foundation.
2. Make safeguarding everyone's responsibility.
3. Provide clear procedures for identifying, reporting, recording and responding to concerns.
4. Ensure safer recruitment and ongoing vigilance.
5. Embed preventative education (including online safety) across the curriculum.
6. Enable effective multi-agency working and lawful information sharing.
7. Comply with Keeping Children Safe in Education 2025 and Working Together to Safeguard Children.
8. Continually improve safeguarding culture and practice.

3. Equality Statement

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

We will give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language.

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after
- Are missing from education.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

4. Roles & Responsibilities

4.1 Trustees/Governing Boards

- Hold overall accountability for effective safeguarding across Emmanuel Schools Foundation.
- Appoint a safeguarding link governor; scrutinise compliance, training, single central record (SCR), and audit outcomes.
- Review and approve this policy at least annually (or sooner after changes/incidents).

4.2 Senior Leadership (CEO/COO/Trust Lead for Safeguarding)

- Ensure each school has a suitably senior, trained Designated Safeguarding Lead (DSL) and deputies with time, status and resources.
- Make safeguarding a standing SLT agenda item; monitor data and trends; ensure robust alternative provision oversight.
- Ensure staff are trained, supervised and supported; ensure systems (e.g., CPOMS) are in place and used well.

4.3 Principal

- Provide strategic leadership to embed a strong safeguarding culture across the school.
- Ensure full compliance with statutory guidance, Trust policy, and local procedures.
- Line-manage and support the DSL, ensuring sufficient time, training, and resources.
- Oversee and report on safeguarding practice, training, and audit outcomes to governors/Trust.
- Manage allegations against staff with the DSL, HR, and LADO as required.
- Ensure safer recruitment and accurate maintenance of the Single Central Record (SCR).
- Promote staff vigilance and ensure all safeguarding concerns are promptly reported and addressed.

4.4 Designated Safeguarding Lead (DSL) & The Deputy Designated Safeguarding Lead (DDSL)

- Take responsibility for safeguarding and child protection, ensuring all concerns are identified, recorded, and acted upon swiftly in line with statutory and local procedures.

- Manage referrals to children's social care, Channel, and other agencies; liaise with the police, health, and other partners as needed.
- Coordinate early help and intervention to support children and families before concerns escalate.
- Attend and contribute to strategy discussions, child protection conferences, and multi-agency meetings, ensuring timely and accurate information sharing.
- Maintain detailed, secure, and up-to-date records of all concerns, decisions, and actions, including clear chronology and rationale.
- Oversee the quality, security, and compliance of safeguarding records, ensuring adherence to data protection and confidentiality standards.
- Deliver, commission, and evaluate safeguarding training, briefings, and updates for all staff, ensuring understanding and compliance with KCSIE and local guidance.
- Oversee filtering and monitoring systems in collaboration with IT and leadership teams, ensuring they are effective, age-appropriate, and regularly reviewed to identify and respond to online safeguarding risks.
- Monitor patterns and trends in safeguarding concerns, referrals, attendance, behaviour, and online safety; oversee risk assessments and safety plans for individual pupils.
- Report regularly to senior leaders, governors, and the Trust, providing analysis, updates, and assurance on safeguarding, filtering, and monitoring arrangements.
- Promote a culture of vigilance, transparency, and professional curiosity, ensuring pupils' welfare is prioritised and safeguarding remains everyone's responsibility.

4.5 All Staff, Volunteers & Contractors

- Read and follow KCSIE Part 1 (and Annex A, as applicable) and this policy.
- Be vigilant to indicators of abuse/neglect/contextual risk.
- Respond appropriately to disclosures; report to DSL same day; record on CPOMS.
- Maintain professional boundaries and model safe, respectful conduct.

5. Record Keeping (CPOMS)

- All concerns, conversations, decisions, actions and outcomes are recorded promptly and factually on CPOMS.
- DSLs review daily, keep chronologies, upload key documents, and restrict access on a need-to-know basis.
- Files transfer securely when pupils move settings; receipt is confirmed.
- Records retained in line with statutory/data-protection schedules.

6. Training & Awareness

- Induction for all: policy, code of conduct, behaviour, reporting routes, DSL contacts, online safety.
- Annual safeguarding training for all staff; regular updates/briefings. Including all updates to National and Local guidance
- Enhanced DSL/Deputy DSL training refreshed at least every two years (and via ongoing updates). DSLs to ensure that they keep their own training and updated via the safeguarding partnership and other opportunities

- Governors/Trustees receive role-specific training.
- Schools maintains a training matrix; non-completion is escalated.

7. Safer Recruitment

- Embed a culture of safer recruitment to help deter, identify, and reject individuals who may pose a risk to children. All recruitment, selection, and pre-appointment checks are carried out in line with *KCSIE 2025* and Trust policy.
- Include clear safeguarding and child protection statements in all job advertisements and recruitment materials, with role profiles detailing the safeguarding responsibilities of the post.
- Use a consistent, transparent recruitment process: application forms (CVs alone are not accepted), structured shortlisting, verification of employment history, and safeguarding-focused interviews exploring values, motivation, and attitudes.
- Carry out mandatory pre-employment checks, including:
 - Enhanced DBS (with children's barred list information where appropriate)
 - Identity verification
 - Right to work in the UK
 - Qualifications and professional status checks
 - Prohibition from teaching and management checks (as applicable)
 - Overseas police and professional checks where relevant
 - References scrutinised for any safeguarding concerns
- Undertake due diligence for agency, contractor, and supply staff, ensuring written assurances and evidence that all required checks have been completed and verified.
- Maintain a comprehensive and accurate Single Central Record (SCR) detailing all required checks for staff, agency workers, contractors, volunteers, and governance members, in accordance with *KCSIE 2025* requirements.

8. Confidentiality & Information Sharing

- Share information lawfully and proportionately where needed to protect a child.
- Seek consent where appropriate, but do not delay or withhold sharing if a child is at risk.
- Record what is shared, with whom, and why.
- Data handled under UK GDPR and Data Protection Act 2018.

9. Alternative Provision (AP) & Off-Site Providers

- The school retains safeguarding responsibility for placed pupils.
- Written assurance of AP safeguarding, safer recruitment, attendance, incident reporting; AP safeguarding lead details held by DSL.
- Frequent reviews (at least every 6 weeks) of attendance, progress and welfare; visits/audits undertaken; placements ended if standards are not met.

10. Prevention & Culture

- Curriculum (PSHE/RSE/Computing) builds knowledge, resilience and help-seeking.
- Pupil voice, inclusive climate, restorative approaches and strong pastoral systems.
- Site, supervision and online risk assessments; targeted interventions for vulnerable pupils.

11. Safeguarding Children with Special Educational Needs and Disabilities (SEND)

11.1 Principles

Learners with SEND may face heightened risk and additional barriers to disclosure. The school will ensure accessible, person-centred safeguarding.

11.2 Practice

- Enhanced vigilance for non-verbal cues and behaviour change.
- Reasonable adjustments (visuals, simplified language, trusted adult, extra time).
- Joint working: DSL and SENCO coordinate plans and reviews.
- Individual risk assessments embedded within EHCP/SEND support plans.
- Consider risk in peer contexts; tailor responses to harmful behaviours.
- Close partnership with health, social care and specialist services.

12. Online & Digital Safety

12.1 Overview

Online risks include grooming, cyberbullying, sexual harassment/violence, image sharing, pornography, extremist content, fraud, mis/disinformation, scams, and privacy breaches.

12.2 Leadership & Governance

- Trustees assure filtering/monitoring meets DfE standards; receive regular assurance.
- Senior leaders implement an online safety strategy (education, tech, response).
- DSL leads incident response with IT/pastoral; all incidents logged on CPOMS.

12.3 Education & Prevention

- Curriculum teaches safe relationships, consent, digital resilience, critical thinking, recognising manipulation and deepfakes, reporting routes.
- Pupil Acceptable Use Policies (AUPs) and staff code of conduct are explicit.

12.4 Technical/Procedural Controls

- Robust filtering & monitoring, reviewed and tested regularly.
- Managed devices and clear BYOD rules; secure platforms for remote learning.

- Prompt incident handling (capture evidence safely, contain/exclude content, inform parents where appropriate, refer as needed).

13. Artificial Intelligence (AI) & Emerging Technologies

13.1 Risks

- Exposure to AI-generated sexual/harmful content, deepfakes or impersonation.
- Amplification of misinformation/extremism and algorithmic bias.
- Privacy/data risks from sharing personal information with AI tools.
- AI-assisted bullying, plagiarism or academic misconduct.

13.2 Controls & Education

- Only approved AI tools may be used; privacy settings and data-minimisation enforced; no uploading of identifiable pupil data.
- Staff vet AI-generated materials before use; teach pupils to evaluate reliability, bias, provenance and consent.
- Digital/AI literacy embedded in curriculum; parents offered guidance.
- AI-related safeguarding concerns are recorded on CPOMS and escalated to the DSL.

14. Designated Teacher for Looked After Children (LAC) & Virtual School

- Each school names a Designated Teacher to liaise with carers, social workers and the Virtual School.
- PEPs are maintained; safeguarding vulnerabilities and transitions are proactively managed; attendance and attainment monitored closely.
- Liaise with Virtual School Heads to support them to promote the educational outcomes of Looked After Children and those in Kinship Care.

15. Children Vulnerable to Radicalisation (Prevent)

Legal Duty:

- From 1 July 2015, all schools must have *due regard to the need to prevent people from being drawn into terrorism* under Section 26 of the Counter Terrorism and Security Act 2015.

Safeguarding Context:

- Radicalisation and extremism are recognised as safeguarding concerns.
- Protecting children from radicalisation is part of the school's duty of care.
- Vulnerable individuals may be exploited or manipulated into extremist activity.

Freedom of Speech:

- The school values freedom of speech and expression as fundamental rights.

- Free speech comes with responsibility it must not be used to promote harm, hatred, or manipulation.
- Speech or behaviour that raises concern will be reported to the Designated Safeguarding Lead (DSL).
- Free speech remains subject to laws and policies on equality, human rights, and community safety.

Scope of Concern:

- The school recognises threats from all forms of extremism, including (but not limited to):
 - Islamist ideologies
 - Far Right/Neo-Nazi/White Supremacist movements
 - Domestic terrorism
 - Irish nationalist/loyalist paramilitary groups
 - Extremist animal rights groups

Risk Assessment:

- The Principal and DSL assess the level of Prevent risk within the school.
- Measures are implemented to reduce risk, including reviews of:
 - RE and Personal Development curriculum
 - SEND and Anti-Bullying policies
 - Assemblies and external speaker use
 - Integration of students by gender and SEN
 - Community context and local issues
 - External speakers are risk-assessed for content and suitability.

Prevent Single Point of Contact (SPOC):

- A Prevent SPOC (often the DSL) acts as the lead for safeguarding related to radicalisation and terrorism.

Online Safety:

- The school monitors online activity **in** line with the Trust's Acceptable Use Policy.
- Inappropriate or concerning online searches are treated as potential safeguarding concerns.

Channel Duty:

- The school must cooperate with the Channel programme and the police under Section 38 of the Act.
- Referrals to Channel are made where there are concerns that a person may be vulnerable to radicalisation.

16. Exploitation, Trafficking & 'Honour' or Faith-Based Abuse (incl. FGM & Forced Marriage)

- CCE/CSE indicators (unexplained money, controlling relationships, missing episodes) trigger immediate DSL review.
- FGM: where mandatory reporting applies (under-18, visually confirmed/disclosed), staff must report to **police** and inform the DSL.
- Forced marriage/HBA: follow statutory guidance and local protocols; do **not** mediate with family.
- Trafficking indicators escalate via safeguarding and the National Referral Mechanism where appropriate.

17. Children Missing from Education (CME) / Missing Episodes

- First-day calling and rapid follow-up; patterns analysed by DSL/Attendance Lead.
- CME referrals made per local authority procedure; no pupil removed from roll without safeguarding checks and LA liaison.
- Return-to-school conversations identify push/pull factors and support needed.

18. Child-on-Child Abuse

- Includes bullying, physical assault, sexual harassment/violence, harmful sexual behaviour (HSB), initiation/hazing, up-skirting, image sharing, coercive control.
- Managed as safeguarding and behaviour issues.

19. PACE & Appropriate Adult

- Where a pupil is detained or interviewed by police, an Appropriate Adult must support them (PACE Code C).
- DSL/SLT liaise with parents/carers, youth justice and legal support to secure an AA and safeguard welfare.

20. Key Procedures (Summary)

1. **Concern/Disclosure:** Listen, reassure, don't promise confidentiality, avoid leading questions.
2. **Record:** Factual notes on CPOMS immediately.
3. **Report:** Notify DSL/Deputy without delay; seek medical/police help if immediate danger.
4. **Decide/Refer:** DSL assesses threshold; initiate Early Help or Children's Social Care/MASH referral; inform parents unless this increases risk or prejudices investigations.
5. **Allegations about staff:** Principal informs LADO the same day; follow managing allegations procedure; preserve evidence; support all parties.
6. **Safety Planning:** Risk assess; implement and review protective measures.
7. **Review & Audit:** Regular DSL case reviews; governor/trustee oversight; learning captured and implemented.
8. **Whistleblowing/Escalation:** Staff can escalate concerns internally or to external agencies if needed.

21. Involving Parents/Carers

- Work in partnership, communicating concerns unless doing so increases risk or prejudices enquiries.
- Provide accessible information on policy, reporting routes and support services.
- Engage parents in prevention (workshops, updates on online safety, attendance).

22. Multi-Agency Working

- Active participation in local safeguarding arrangements; timely information sharing; professional challenge where thresholds are disputed.
- Attendance at conferences, core groups, exploitation/missing panels; contribution of school evidence and assessments.
- Implement learning from reviews and audits across Emmanuel Schools Foundation.

23. Review & Approval

- Policy reviewed at least annually or following changes to legislation/guidance, serious incidents or inspections.
- Approved by Trustees/Governing Boards; updates disseminated to all staff/volunteers; acknowledgements recorded.