Diocese of Hereford Multi-Academy Trust

Central Safeguarding and Child Protection Policy

Review: September 2027

Roles and responsibilities, as set out in this policy.
Responsible Trustee/Director
Chief Executive
Director of Safeguarding

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1.0 Purpose

1.1 The Diocese of Hereford Multi-Academy Trust (Trust) believes that a child or young person should never experience abuse of any kind. Across the Trust, at all levels, each adult has a responsibility to promote the welfare of all children and young people and to keep them safe. Our organisational culture and practice at each level of the organisation is reflective of this duty.

1.2 The Trust Local Governing Boards (LGB) of all schools take seriously their responsibilities, under sections 157/175 of the Education Act 2002, to safeguard and promote the welfare of children; and to work together with other agencies, to ensure adequate arrangements within our schools to identify, assess and support those children and young people who are suffering harm.

1.3 The purpose of this document is to provide an overview of requirements for safeguarding and child protection that are shared across the Trust. This includes the role of the Trust in the leadership, oversight and quality assurance of safeguarding and child protection arrangements, and practice in the Trust schools.

1.4 The Trust provides a template safeguarding and child protection policy for use in each school. It remains important that individual school policies are reflective of local context and characteristics. Each school within the Trust will provide site specific detail in their policy document. Individual school policies are published on each school website. A list of Trust schools and their respective websites are included in Appendix 1 of this document.

1.5 This policy should be read alongside the following documents:

DHMAT Central Policies:

- DHMAT: Dealing with Allegations of Abuse against Adults
- DHMAT: Safer Recruitment Policy
- DHMAT: Staff Code of Conduct
- DHMAT: Low Level Concerns Policy
- DHMAT: Confidential Reporting/Whistleblowing Policy

Local School Policies:

- School Child Protection policies
- Child-on-Child Abuse protocols
- Online Safety Policy
- Mobile Phone Policy
- Relationships, Sex and Health Education Policy
- Behaviour Policy
- Administration of School Medicines Policy

Statutory Guidance:

- DfE Keeping Children Safe in Education
- Working Together to Safeguard Children
- Local Child-on-Child Abuse Protocols

Legislation:

- The Children Act 1989 and 2004
- The Children and Social Work Act 2017
- The Education Act 2002
- The Crime and Policing Act 2026
- The Equality Act 2010
- The Human Rights Act 1998
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025

2.0 The Law and National Framework

2.1 The requirements of the Trust and each school to safeguard and promote the welfare of all children and young people are set out in legislation and departmental guidance. The policy and protocols of the Trust are determined by these. Directors, Staff and LGB members should also be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty).

2.2 Departmental Guidance

The government guidance 'Working Together to Safeguard Children 2026 ' and 'Keeping Children Safe in Education ' are the essential national safeguarding documents and give practical guidance on implementing legal requirements. Each school should ensure that these are accessible to staff.

2.3 KCSIE Reading Requirements

All adults working within the Trust must be issued with their own copy of Part 1 (in full) of 'Keeping Children Safe in Education', and each subsequent update.

The condensed version previously found in Annex A has been removed from KCSIE. All staff, including those who do not work directly with children, must now read Part 1 in full.

Annually, time must be given for staff to read and comprehend the document. Staff must confirm by return that they have both read and understood the document. This confirmation should be stored on MyConcern.

2.4 Local Partnership Arrangements

Local Safeguarding Partnerships comprise senior managers from Children's Services, Health and Police who oversee, at a local level, inter-agency arrangements for safeguarding. Each partnership has an individual offer that relates to the community they serve. This body produces local procedures in line with 'Working Together to Safeguard Children 2026'. Each school must show due regard to local partnership arrangements. It is also an expectation of the Trust that Designated Safeguarding Leads (DSLs) will attend update events and training as required or requested by their local partnership arrangements.

2.5 Local School Arrangements

Each school maintains its own safeguarding policy, based on the Trust template policy, the arrangements of which are reflective of the requirements set out above.

These site-specific documents must be published on individual school websites and must be renewed annually. It is also the responsibility of individual schools to implement associated policies, including (not exhaustive):

- Safer Recruitment
- Administration of School Medicines
- Pupil Behaviour
- Child-on-Child Abuse
- Relationships, Sex and Health Education
- Online Safety
- **Mobile Phone Policy**
- The Staff Code of Conduct
- Low Level Concerns Policy

2.6 Schools will complete their local Safeguarding Children Partnership's annual safeguarding audit.

2.7 Definitions

Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. This applies to **all children** in our care and in our communities. **Safeguarding is everyone's responsibility.**

2.7.1 Safeguarding means:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

'Child protection', however, is defined as:

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

2.7.2 Therefore, *protection* is a specific element of safeguarding, whereas safeguarding legislation in general is about the promotion of children's needs and the prevention of harm. This emphasises the need for all staff to be able to respond early when they have a concern rather than wait until this is more defined and certain.

The most critical message from the legislation is that **"the child's welfare is paramount".**

3.0 Roles and Responsibilities

3.1 Everyone has a role to play in ensuring the well-being and safety of children, young people, their families and each other. Below is a brief description of those core responsibilities.

3.1.1 All Staff

This applies to all adults working in our schools, including:

- All permanent and temporary staff
- Supply teachers
- Trainee teachers
- Volunteers
- Contractors

All staff will:

- make sure they have undertaken the appropriate training for their role;
- take responsibility to report any concerns, no matter what their role;
- **ensure they have a copy of Part 1 (in full) of Keeping Children Safe in Education** and that they have read and understood it;

- be aware of the need to minimise their own vulnerability in not being alone with children or in situations that could render them vulnerable to poor practice and/or allegations against them; and
- always be aware of the needs of young people and be vigilant for any possible signs of abuse.

3.2 The Designated Safeguarding Lead (DSL)

3.2.1 The DSL is the member of the school's Senior Leadership Team who is responsible for the strategic leadership of safeguarding.

3.2.2 The DSL is the person to whom staff should pass their concerns and who will ensure a practical and efficient way of dealing with those concerns. Whilst practical aspects of this work may be allocated, by the DSL, to Deputy DSLs and other pastoral staff, leadership of safeguarding and associated activities remain the responsibility of the DSL, as specified in job descriptions.

3.2.3 **It is imperative that DSLs (or substitute staff) should attend and contribute to Trust-wide development and learning events.**

3.2.4 The DSL will:

- be available for consultation during normal school hours. The DSL will usually be available on site. However, availability may also be via Teams or telephone.
- **implement robust cover arrangements for when the DSL is unavailable (e.g. a confidential shared mailbox to make sure safeguarding concerns are received, monitored and acted on without delay)**
- ensure an open and efficient route for staff to bring concerns to them of any sort and to have their concerns taken seriously;
- ensure he/she is appropriately trained to carry out the role;
- support staff in ensuring that they receive appropriate training;
- promote the procedural pathway within the school so staff are aware of the way to report concerns (via MyConcern);
- ensure the school procedures are followed and adhered to with regard to referring a child if there are concerns about possible abuse;
- offer clear advice and support to staff bringing concerns or needing help;
- consider whether concerns referred to him/her need to be referred to Children's Services/Social Care;
- **understand the distinction between community-based early help and targeted early help (Family Help)**

- offer appropriate feedback, as necessary, as to the progress of the concern;
- maintain written records of concerns about a child, even if there is no need to make an immediate referral and to keep a record system to ensure consistency;
- discuss with the Headteacher any complex concerns;
- ensure that all such records are kept confidentially and securely and are separate from pupil records (MyConcern);
- ensure that an indication of further record-keeping is marked on the pupil record;
- ensure complex and concerning cases are referred without delay;
- follow the LSP's escalation policy, when cases are not progressing in an acceptable manner;
- gather, collate and analyse as appropriate all relevant information for purposes of quality assurance;
- hold the responsibility to ensure that children who have, or have had, a social worker maintain academic and attendance standards;
- understand the role of the 'Appropriate Adult' within a police investigation;
- **when transferring child protection files to a new school, include a summary setting out the current safeguarding concerns, relevant context, and any ongoing support needs**
- **take particular care to distinguish between current safeguarding concerns and historic information to ensure past issues are presented with appropriate context**
- **understand the assessment process for providing Family Help (previously Early Help)**
- **oversee the annual review of filtering and monitoring systems (see section 12 below)**
- **understand the harmful sexual behaviour (HSB) continuum and how it may escalate into sexual harassment or sexual violence**

3.3 Deputy Designated Safeguarding Lead (Deputy DSL)

Each school within the Trust will appoint at least one Deputy DSL, who will formally provide cover and additional capacity for the DSL. Each Deputy DSL will be trained to the same level as the DSL. There will always be, present on site, either the DSL or a DDSL.

3.3.1 In the event of the long-term absence of the DSL, the Headteacher will identify a Deputy DSL to undertake the duties of the DSL listed above.

3.3.2 **It is up to schools to decide whether to have one or more deputy DSLs. Any deputy should be trained to the same standard as the DSL.**

3.4 The Headteacher

3.4.1 The Headteacher in each school is responsible for ensuring that the DSL is effective in their role of providing and accessing high quality services to safeguard and promote the welfare of children and young people accessing provision from their school. The Headteacher will:

- Provide day to day support and guidance to the DSL towards the promotion of safeguarding throughout the school, ensuring all staff are appropriately trained and aware of their responsibilities
- ensure cover is provided where necessary in the absence of the DSL
- offer supervision from an appropriate professional to the DSL in relation to their role and decisions made;
- ensure that a senior member of staff is designated as the person in charge of Looked After and Previously Looked After Children and receives appropriate training
- encourage pupils and parents to inform the school of any concerns;
- work with the representative of the LGB to put mechanisms in place to ensure that pupils requiring safeguarding measures are monitored in relation to their situation and progress with their learning
- ensure all recruitment procedures follow safeguarding best practice, **including compliance with the Crime and Policing Act 2026 regarding the new definition of regulated activity and removal of the supervision exemption for volunteers**
- contribute to quality assurance processes
- ensure sufficient allocation of time given to DSLs to undertake the role
- **ensure the school has implemented a mobile phone policy whereby pupils do not have access to their mobile phones during the school day**
- **ensure arrangements are in place to support pupils with medical conditions, including allergy safety policies**

3.5 The School Senior Leadership Team

3.5.1 The school Senior Leadership Team will support the Headteacher to discharge the duties to safeguard children and young people to:

- promote the importance of safeguarding throughout the school
- oversee the effectiveness of safeguarding systems, especially procedures, and review and report any changes that are required
- support the work of the DSL, to ensure an effective process for dealing with concerns
- ensure that the school fulfils its statutory duty to co-operate with other agencies and that the chain of accountability is clear, from front line to senior level

- **ensure a designated senior leader is responsible for filtering and monitoring, working with the DSL and IT support**

3.6 Diocese of Hereford Multi-Academy Trust (Trust) Safeguarding Director

3.6.1 The Trust Safeguarding Director provides strategic leadership within the Trust for all aspects of safeguarding children and young people. Operational matters should be addressed in accordance with arrangements in each respective local authority.

3.6.2 The Trust Safeguarding Director will:

- ensure that all policies and procedures are reviewed and updated, in line with national and local requirements, and that appropriate changes are disseminated to all schools
- ensure that there are systems in place to support the effective management of safeguarding, especially the role of DSLs, training for all staff and supervision, as appropriate
- ensure that there is available to the Headteacher, someone who can offer appropriate external advice and support with safeguarding concerns, especially when they are complex and/or relate to allegations against staff
- ensure that Quality Assurance processes are in place, and oversee the information they produce, to measure the progress and effectiveness of existing safeguarding frameworks
- produce information to the Trust Board, in relation to Safeguarding, to ensure that the Board can demonstrate that it is discharging its safeguarding obligations appropriately
- **ensure Trust-wide compliance with KCSIE requirements, including:**
    - **All staff reading Part 1 of KCSIE in full (no condensed version)**
    - **Compliance with the new regulated activity definition and removal of the supervision exemption for volunteers**
    - **Annual review of filtering and monitoring systems across all Trust schools**
    - **Implementation of mobile phone policies across all Trust schools**
    - **Compliance with requirements regarding children questioning their gender (where applicable to school phase)**

3.7 The Chief Executive Officer (CEO)

3.7.1 The CEO, as Accountable Officer, will:

- Provide appropriate challenge and support to Trust's Safeguarding Director, to ensure the Trust and the schools it sponsors are taking all opportunities to safeguard and protect the children and young people that access their services
- Support Headteachers with the management of allegations made against adults, staff or volunteers within the school community

4.0 Governance of Safeguarding

4.1 The Trust's board nominates a member to take oversight of safeguarding arrangements. The role of the board member for Safeguarding is to ensure appropriate challenge and support to the board, and to the Safeguarding Director, to ensure that the Trust is fulfilling its safeguarding duties identified in the statutory guidance Keeping Children Safe in Education.

4.2 The day-to-day leadership of safeguarding is delegated to The Trust Safeguarding Director, who works with Headteachers and DSLs to ensure that all statutory duties are fulfilled.

4.3 The Trust Safeguarding Director provides regular reports to the board member with responsibility for safeguarding, along with other members of the Trust Board.

4.4 **The Trust Board facilitates a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.**

5.0 Trustee/Directors' Responsibilities

5.1 The Trust Board has a legal responsibility to make sure that each school has an effective safeguarding policy and procedures in place and monitors that the schools comply with these. The Trust Board will do this by:

1. Scrutinising information from safeguarding audits of schools
2. Receiving regular reports from the Safeguarding Director
3. Delegating operational responsibilities to LGB, as defined below and set out in the Trust Scheme of Delegation
4. Board members are required to receive appropriate safeguarding and child protection (including online) training at induction. This training should equip directors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole-school approach. This training must focus on their strategic role and not on operational procedures.
5. **Ensuring compliance with KCSIE requirements across all Trust schools, including:**
    - **All staff reading Part 1 of KCSIE in full (no condensed version)**
    - **Compliance with the new regulated activity definition (Crime and Policing Act 2026) and removal of the supervision exemption for volunteers**
    - **Annual review of filtering and monitoring systems**
    - **Implementation of mobile phone policies**

- **Compliance with requirements regarding children questioning their gender (where applicable to school phase)**
- **Updated terminology for image sharing ("making or sharing of nudes or semi-nudes" including AI-generated images)**

5.2 **Board members must read Part 1 of KCSIE in full** to understand their safeguarding responsibilities.

6.0 LGB Members' Responsibilities

6.1 The LGB of each school has appointed a named Safeguarding LGB member who has lead responsibility for overseeing and monitoring all safeguarding issues in each school.

6.2 The LGB will ensure that the named member for Safeguarding & Child Protection attends the required training and that they refresh their training every two years.

6.3 LGB members are required to receive appropriate safeguarding and child protection (including online) training at induction. This training should equip local governance with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole-school approach. This training must focus on their strategic role and not on operational procedures.

6.4 **LGB members must read Part 1 of KCSIE in full** to understand their safeguarding responsibilities.

6.5 **The LGB should:**

- Make themselves aware of, and follow, their local safeguarding partnership arrangements
- Be prepared to supply information requested by the safeguarding partners
- Understand the local criteria for action and protocol for assessment, and make sure these are reflected in school policies and procedures
- Ensure the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensure all staff undertake appropriate safeguarding and child protection training and update this regularly
- **Ensure the school has published an inclusion strategy on the school website (see Ofsted requirements)**
- **Ensure the school has an effective mobile phone policy in place**
- **Ensure filtering and monitoring systems are reviewed at least annually**

7.0 Quality Assurance

7.1 Robust safeguarding practices and procedures are key to supporting and safeguarding the children and young people that access services from the Trust. Effective quality assurance measures are essential in ensuring the practices and procedures are fit for purpose. Trust processes are set out in Appendix 2 of this policy.

7.2 Three assurance categories are in place to monitor safeguarding within the Trust (Red, Amber and Green) and schools are placed in the category based on the current rating of their practices.

It is important to note that the grading of each school is reviewed frequently and may be subject to change without prior notice.

7.3 **Quality assurance processes will include monitoring compliance with KCSIE requirements, including:**

- Part 1 reading by all staff
- Volunteer vetting procedures (new regulated activity definition)
- Filtering and monitoring annual reviews
- Mobile phone policy implementation
- Single Central Record compliance

8.0 Escalation

8.1 Internal

All staff should be confident to act when concerned that there appears to be a lack of progress or improvement. The following examples are not exhaustive but illustrate the nature of these concerns:

- difficulty in getting hold of a DSL;
- staff not being satisfied about the decision of the DSL or Headteacher;
- staff aware that a colleague has not passed on a concern;
- external agencies not accepting a referral from a school when it is felt one is needed;
- staff not aware of what has happened to their concern because of a lack of feedback.

8.1.1 Staff should not close down a concern because they feel "stuck" or "they can't do anymore". It is important to escalate concerns to the DSL, Headteacher, other senior staff or, if necessary, to the Director of Safeguarding.

8.1.2 If there are concerns about the work of an external agency, please refer to the escalation policy published by the Local Safeguarding Partnership.

8.1.3 The key principle is not to allow a concern to be "closed down" without it having received the necessary attention, assessment and resolution.

If the options above have been explored fully and the concern still isn't being handled effectively and therefore placing the child or young person at risk, it is important that you continue to escalate your concerns by contacting the Trust or by contacting the NSPCC Whistleblowing Advice Line on 0800 028 0285.

9.0 Managing Allegations against Adults Working within the Trust

9.1 The Trust takes very seriously allegations against members of staff and acknowledges that if concerns are not addressed promptly (refer to Staff Code of Conduct and Low Level Concerns Policy) they can create unsafe working environments and leave staff and children vulnerable. Please see the Dealing with Allegations of Abuse against Adults policy.

9.2 The Trust has a Confidential Reporting/Whistleblowing Policy. This policy should be followed in cases in which concerns are identified in relation to an adult working within The Trust, the conduct of whom affects/could affect pupil(s) welfare or may result in a safeguarding issue and if there is a lack of confidence in this being addressed through internal policy.

9.3 Should you have any concerns about staff or colleagues in the context of pupil welfare and safeguarding, please refer to the above policies for the appropriate course of action.

9.4 **This includes concerns about:**

- Supply teachers
- Trainee teachers
- Volunteers
- Contractors

All of whom are explicitly covered by KCSIE.

10.0 Child-on-Child Abuse

10.1 Each of the 3 local safeguarding partnerships, within the geographical area of the Trust, has produced separate interagency protocols for child-on-child abuse. Trust schools will use these local protocols and ensure that they are understood by all staff and LGB members across the Trust.

10.2 **All Trust schools must understand that:**

Harmful Sexual Behaviour (HSB) Continuum:

- **Harmful sexual behaviour (HSB) exists on a continuum and may escalate into sexual harassment or sexual violence**
- **We recognise the importance of:**

- **Understanding the distinction between HSB, sexual harassment and sexual violence**
- **Early identification and intervention to minimise risks**
- **Understanding age-appropriate sexual development and behaviour**
- **Recognising that misogyny and misandry are escalatory, and early identification minimises the risks of HSB, sexual harassment and sexual violence**

10.3 **Making or Sharing of Nudes or Semi-Nudes**

The terminology "making or sharing of nudes or semi-nudes" has replaced "sexting" or "youth produced sexual imagery".

This includes:

- Consensual and non-consensual making and sharing of nude and semi-nude images and/or videos
- **Images digitally altered or wholly generated by artificial intelligence (e.g., deepfakes)**

All such incidents mandate a safeguarding response, regardless of whether they are consensual or not.

Schools should refer to their online safety policies and local child-on-child abuse protocols. Our approach is based on guidance from the UK Council for Child Internet Safety.

10.4 **All staff must understand that:**

- Child-on-child abuse can happen between children both inside and outside school and online
- Even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- Victims should know they'll be taken seriously, be supported and kept safe
- Children may not feel ready or know how to tell someone they're being abused
- **Addressing inappropriate behaviour can help prevent abusive/violent behaviour – dismissing behaviour such as grabbing, flicking bras and lifting up skirts risks normalising them**
- A pupil harming a child could be a sign that the child is being abused themselves

11.0 Supporting Children Who Are Questioning Their Gender

This section applies to all Trust schools. Schools should adapt implementation based on their phase and context.

11.1 Our Approach

We recognise that sometimes young children go through a period of questioning their gender, but for the majority this will not continue into adulthood. We will:

- Take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious
- Be aware of the potential vulnerabilities of these children (e.g. complex mental health and psychosocial needs relating to relationships with family and peers)
- Consider adopting policies that maintain flexibility and avoid rigid rules based on gender stereotypes
- Take a strong, proactive stand against all forms of bullying, including misogyny and misandry
- Actively involve parents/carers where a child who is questioning their gender asks for support, unless there are exceptional circumstances where doing this would constitute a greater risk to the child than not involving them

11.2 Social Transition

Our schools will not initiate any action regarding social transition. We will only respond to a request relating to social transition raised by a child or their parent/carer.

We will take a **'very careful approach'** to social transition. **Primary schools must exercise particular caution, and support for full social transition should be agreed 'very rarely'.**

Staff must not adopt any changes relating to social transition unless a decision has been made by the school and the child's parents/carers have been involved, except in exceptionally rare cases where doing so would pose a greater risk to the child.

When responding to requests for support with social transition, we will:

- Document our decision-making process and keep records
- Ensure decisions are based on:
    - Our statutory duty to safeguard and promote the welfare of all children
    - The importance of actively involving parents/carers as a matter of priority and treating their views with importance
    - Taking a very careful approach to social transition
    - Our obligations under the Equality Act and Human Rights Act
    - An assessment that considers the welfare and best interests of the child and other children

11.3 School Premises and Facilities

Our schools must not allow children into toilets, changing rooms or showers designated for the opposite biological sex. This includes where we are responding to a request to support social transition. There are no exceptions to this requirement.

If a pupil who is questioning their gender does not want to use the facilities designated for their biological sex, we will consider providing alternative facilities that:

- Do not compromise the provision of single-sex facilities
- Do not compromise the safety, comfort, privacy or dignity of the child or any other children
- For mixed-sex toilets (if provided in addition to single-sex facilities): are individual, lockable rooms that open directly onto public areas

We will:

- Keep records of these situations
- Communicate them appropriately
- Review them regularly

The same requirements apply to boarding and residential accommodation where applicable.

11.4 Sports and PE

We must ensure that some sports are played as single-sex sports from a certain age to ensure children's safety. There must be no exceptions in these sports, including for children who wish to socially transition.

Other sports may be segregated according to biological sex on the grounds of fairness. This applies to participation in any sport, game, or activity of a competitive nature where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa).

This segregation is not considered discriminatory under the Equality Act 2010.

Where there are no safety concerns, we will consider any request a child makes regarding how they participate in sports in line with:

- The best interests of the child
- The impact on other children
- The aim of creating a safe and fair environment for all children to participate in PE

11.5 Recording Information

We are legally required to record a child's biological sex accurately wherever it is recorded.

11.6 Reviewing Decisions

Schools should review any decisions made regarding support for children questioning their gender regularly, and whenever circumstances change.

12.0 Filtering and Monitoring

All Trust schools must have appropriate filtering and monitoring systems in place to limit children's exposure to online safety risks and protect them from harmful content.

12.1 Annual Review Requirement

Schools must review the effectiveness of their filtering and monitoring systems at least once every academic year. This is a mandatory requirement under KCSIE.

This review must be carried out by the senior leader responsible for filtering and monitoring, supported by the DSL and IT support. Schools must keep records of these reviews.

12.2 The Review Must Consider:

- The number and age range of pupils
- Those who are potentially at greater risk of harm
- How often pupils access IT systems
- The proportionality of costs versus safeguarding risks
- **How filtering and monitoring requirements apply to generative AI**
- The DfE's filtering and monitoring standards

12.3 Schools Must Ensure That:

- The leadership team and relevant staff are aware of and understand the provision in place
- Systems are managed effectively
- Staff know how to escalate concerns
- "Over-blocking" doesn't lead to unreasonable restrictions on what pupils can be taught

12.4 Governance

- The child protection/online safety policy must cover appropriate filtering and monitoring
- The governing board must do all it reasonably can to limit children's exposure to online safety risks
- **Records of annual reviews must be maintained and reported to local governance**

12.5 Generative AI

We recognise that generative AI presents both opportunities and risks for safeguarding. Our approach to the educational use of generative AI addresses:

- Safeguarding risks
- Data protection requirements (UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025)
- Ethical considerations

Our filtering and monitoring systems include consideration of generative AI use. Staff receive training on the safeguarding implications of AI, including:

- The creation of deepfake images (nudes or semi-nudes)
- Data protection concerns
- Age-appropriate use

13.0 Mobile Phones in Schools

13.1 Policy Requirement

All Trust schools are expected to implement a policy whereby pupils do not have access to their mobile phones during the school day. This includes lessons, breaktimes, and lunchtimes.

This requirement is set out in KCSIE and reflects the government's expectation that schools should be "mobile phone-free environments."

13.2 Each School's Mobile Phone Policy Should:

- Set out clear expectations for pupils
- Explain the rationale for the policy
- Detail how the policy will be enforced
- Outline sanctions for non-compliance
- Address how the policy applies to different age groups (where relevant)
- Be published on the school website

13.3 Communication

Schools should ensure parents/carers are aware of the mobile phone policy and understand the safeguarding reasons behind it.

13.4 Ofsted Inspection and mobile ‘phones and devices

From April 2026, Ofsted will inspect schools' mobile phone policies as part of inspection activities.

Appendix 1

List of Trust Schools

Bishop's Castle Primary - https://www.bishopscastle-pri.shropshire.sch.uk/

Bitterley CE Primary School - http://www.bitterleyschool.co.uk/

St Michael's CE Primary School Bodenham - https://www.st-michaels.hereford.sch.uk/

Burford CE Primary School - https://www.burfordceprimary.co.uk/

Burley Gate CE Primary School - https://www.burleygate.hereford.sch.uk/

Coalbrookdale and Ironbridge CE Primary School - https://www.coalbrookdaleschool.org.uk/

St George's CE Academy, Clun - https://www.clunprimaryschool.org.uk/

Condover CE Primary School - https://www.condoverschool.co.uk/

St Edward's CE Primary School, Dorrington - https://www.dorringtonschool.co.uk/

Eastnor Primary School - https://www.eastnorschool.co.uk/

Goodrich Primary School - https://www.goodrichprimarysch.co.uk/

Ludlow Primary School - https://www.ludlowprimaryschool.co.uk/

Ludlow CE School - https://www.ludlowschool.com/

Morville CE Primary School - http://www.morvilleschool.org.uk/

Much Marcle Primary School - http://www.muchmarcle.hereford.sch.uk

Pembridge CE Primary School - Pembridge CE Primary School - Home

Lydbury North Primary school - Lydbury North Church of England Primary School - Home

Onny Primary School - Onny Church of England Primary School - Home

St Thomas Cantilupe CE Academy - https://www.st-thomascantilupe.org/

Tenbury CE Primary Academy - https://www.tenburyceprimary.co.uk/

The Hereford Academy - https://www.theherefordacademy.org.uk/

Appendix 2 Annual cycle of quality assurance 2026/27

Regular monitoring is essential to ensure that effective policies and procedures are in place. This is to improve the quality of safeguarding practice and impact at all levels of the Trust. The **board member for safeguarding** and the **Safeguarding Director** ensure the oversight and quality assurance of safeguarding at each school through an annual cycle of monitoring activities. This assists the safeguarding team at each school in supporting effective safeguarding practice by: evaluating measures currently in place; identifying developments that may be required to improve policy and practice.

Quality Assurance Cycle

What	Who	When
1.0 Single Central Record compliance check: 1.1 SCR up to date and maintained on Sentry. 1.2 Trust monitoring template and completed actions signed and retained. 1.3 DSL keeps signed copy on file.	Overall responsibility for the maintenance, accuracy and scrutiny of the SCR lies with the DSL and Headteacher. Local governance to seek assurances about the correct use of safer recruitment policies and processes Safeguarding Director to check SCR during scheduled in-depth visits.	termly
2. Website and policy compliance check: 2.1 School safeguarding and child protection policy (and associated policies) 2.2 Trust central safeguarding policy	Headteacher	autumn term

3.0 Whole staff safeguarding CPD and annual updates, including KCSiE 3.1 Staff sign to acknowledge reading and understanding their responsibilities in KCSiE 3.2 Staff assessment to demonstrate understanding of KCSiE 3.3 Code of conduct and annual declaration	DSL or Headteacher leads CPD **All staff** to complete training. Sign-off recorded on MyConcern Each staff member to complete knowledge test and revisit key learning points Staff read code of conduct and sign annual declaration of 'no convictions or cautions'	autumn term before pupils return

4.0 Safeguarding briefings all staff. 4.1 DSLs should adapt and adopt the CPD cycle provided by The Key, supplemented with local contextual themes, issues identified in school, and materials from trusted providers.	Weekly safeguarding briefings or bulletins to continuously update staff knowledge and understanding	Weekly
5.0 LGB familiarity with the management of safeguarding. 5.1 All LGB members to read required section of KCSiE	LGB	Autumn half term 1
6. Completion of annual online Safety Audit and action plan via SWGfL 360	DSL	Autumn term
7. Termly monitoring of the effectiveness of filtering for harmful content. Completed template retained and reported to local governance.	DSL to liaise and complete checklist of assurance processes.	Termly

8. Staff safeguarding committee meeting to: 8.0 identify and address issues arising from filtering and monitoring checks and wider online safety; 8.1 monitor the progress of the safeguarding action plan; 8.2 identify and address risks and issues (including bullying and child-on-child abuse) arising from capture of pupil voice and from logged reports and concerns; Use these to inform report to LGB and to identify actions and record progress.	DSL, Headteacher, staff member with responsibility for online security.	Termly safeguarding committee – recommended
9.0 Termly Safeguarding report to LGB. 9.1 To be completed on Trust safeguarding report proforma. This provides local governance with the evidence to facilitate support and challenge. 9.2 Termly reports uploaded to governor hub in advance of meetings.	DSL	Termly LGB meeting
10.0 Annual safeguarding audit. 10.1 All Trust schools to complete their local safeguarding partnership's annual audit and development planning tool on the online platform. 10.2Key themes from aggregation of audit data to be reported to the Board of Directors.		Autumn term

11.0 Quality assurance visit encompassing: accuracy and evidence base for self-assessment; conversations with staff and pupils, scrutiny of files and folders. 11.1 Priority 1 : • New school to Trust; • impending Ofsted inspection; • high support needs identified; • serious complaints or incidents related to safeguarding. 11.2 Priority 2. New DSL 11.3 Priority 3. Established schools	Director of Safeguarding	2 year cycle unless otherwise specified Immediate and ongoing, when required Termly meeting In-depth visit every 2 school years
12.0 System use 12.1 Dashboards set up and regularly maintained on MyConcern. 12.2 Concerns categorised and filed 12.3 Profile flags for levels of need and agency involvement are set and reviewed 12.4 Health checks by TES safeguarding completed and action implemented 12.5Case file audit analysis of the quality and impact of record keeping on MyConcern	DSL	Ongoing maintenance Weekly Half termly Annually Annually
14.0 Staff, pupil and parent voice safeguarding surveys	DSL	At least annually with impact on areas for development monitored and shared.