Date of last review:	September 2026	Review period:	Annually
Date of next review:	September 2027	Owner:	Director of Trust Safeguarding and Culture

Safeguarding and Child Protection Policy

The Trafalgar School at Downton fully recognises its responsibilities for safeguarding and child protection.

Key Safeguarding Personnel			
Role	**Name**	**Tel.**	**Email**
CEO	Chris Prankerd	01722 342425	cprankerd@magnalearningpartnership.org.uk
Director of Trust Safeguarding	Maeve McNeill	01722 342425	mmcneill@magnalearningpartnership.org.uk
Headteacher	Jy Taylor	01725 550334	
Designated Safeguarding Lead (DSL)	Rachael Faulkner	01725 550300	r.faulkner@trafalgar.wilts.sch.uk
Deputy DSL(s) (DDSL)	Jill Dawson	01725 550300	j.dawson@trafalgar.wilts.sch.uk
Nominated Governor	Ginny Griffiths Robin Cresswell		g.griffiths@trafalgar.wilts.sch.uk r.cresswell@trafalgar.wilts.sch.uk
Nominated Trustee	Claire Foxley		cfoxley@magnalearningpartnership.org.uk
Designated Teacher for Looked After Children	Rachael Faulkner	01725 550300	r.faulkner@trafalgar.wilts.sch.uk
Senior Mental Health Lead (non-mandatory)	Rachael Faulkner	01725 550300	r.faulkner@trafalgar.wilts.sch.uk
Prevent Lead	Rachael Faulkner	01725 550300	r.faulkner@trafalgar.wilts.sch.uk
Medical/Allergy Lead	Rachel Reeves	01725 550334	r.reeves@trafalgar.wilts.sch.uk
Confidential safeguarding mailbox:		safeguarding@trafalgar.wilts.sch.uk	
The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education (2026)			

History of Policy Changes

Date	Page	Change	Origin of Change
Sept 2024		Updated in line with KCSIE	KCSIE 2024
Sept 2026		Updated roles and responsibilities	KCSIE 2026
April 2026		New CEO details	
Sept 2026		Updated in line with KCSIE	KCSIE 2026

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1.1 Definitions

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children 2026 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.
- taking action to enable all children to have the best outcomes

Child Protection is part of safeguarding and promoting the welfare of children and is defined in Working Together to Safeguard Children as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including in foster care and residential care, as well as online.
Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

Effective safeguarding is anti-discriminatory and anti-racist. All practitioners should understand and be sensitive to factors, including economic and social circumstances, ethnicity and disability which can impact children and families' lives.

1.2 Introduction

At The Trafalgar School at Downton

- Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who encounters children, their families, and carers, has a role to play.
- In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should always consider what is in the **best interests** of the child.
- We take an '**it can happen here**' approach where safeguarding is concerned.
- **Everyone** who encounters children has a role to play in identifying concerns, sharing information, and taking prompt action.
- Victims of harm should **never** be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The Trafalgar School at Downton is committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children and young people can learn.
- Acting on concerns about a child's welfare immediately.
- Fulfilling our legal responsibilities to identify children who may need early help or who are suffering, or are likely to suffer, significant harm.

All action taken by The Trafalgar School at Downton will be in accordance with current legislation and guidance. The following safeguarding legislation and guidance have been considered when drafting this policy:

- Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)
- The Safeguarding Vulnerable Groups Act 2006
- Teachers' Standards (Guidance for school leaders, school staff and governing bodies)
- Working Together to Safeguard Children
- Keeping Children Safe in Education
- Information Sharing 2024
- What to do if you're worried a child is being abused

- Filtering and monitoring standards in schools and colleges (DfE)
- Use of reasonable force and other restrictive interventions guidance
- Local Guidance from the Local Safeguarding Children Partnership: Wiltshire Safeguarding Vulnerable People Partnership (SVPP) - Home page
- Prevent duty guidance: England and Wales (2023) - GOV.UK
- Generative artificial intelligence (AI) in education - GOV.UK

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

- Recruitment
- Whistleblowing
- Staff Code of Conduct
- Low Level Concerns
- Complaints Procedure
- Behaviour (which should include measures to prevent child on child bullying, harmful sexual behaviour including cyberbullying, prejudice-based and discriminatory bullying, and suspensions and exclusions)
- Online Safety
- Looked After Children
- Attendance (including the safeguarding response to children who are absent or are missing from education)
- Health and Safety
- Mobile Phone
- SEND policy
- Supporting pupils at school with medical conditions

Through regular monitoring, the Headteacher should ensure that the above policies and procedures, adopted by academy governance committees and proprietors, are accessible, understood and followed by all staff.

1.3 Equality and Diversity

With regards to safeguarding we will consider our duties under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. General duties include:

1. Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
3. Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under The Trafalgar School's equality statement and measurable objectives. These are available on our website; Policies | The Trafalgar School
Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy on our website; Policies | The Trafalgar School

The Trafalgar School at Downton also adheres to the principals of and promotes anti-oppressive practice in line of the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

1.4 Overall Aims

This policy will contribute to the safeguarding of children at The Trafalgar School at Downton by:

- Clarifying safeguarding expectations for members of the education setting's community, staff, volunteers, academy governance committee, learners, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; and that our learners are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice, and are listened to.
- Understanding extra-familial risks, recognising that the setting's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the setting's community (staff, learners, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with learners, parents, and other agencies in the Local Safeguarding Partnership including Early Help/Family Help.

The Trafalgar School at Downton is named as a relevant agency in the Local Safeguarding Partnership (Wiltshire Safeguarding Vulnerable People Partnership). This policy sets out its statutory duty to co-operate, follow and comply with published arrangements as set out by the Wiltshire Safeguarding Children Partnership's professional expectations, roles, and responsibilities.

1.5 Professional expectations, roles and responsibilities

1.5.1 Role of all staff

- All staff will read and understand Part 1 of Keeping Children Safe in Education (2026) in full. Those working directly with children will also read Annex A (Further information).
- In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding/Child Protection Policy; the Behaviour Policy; the Staff Code of Conduct; safeguarding response to children who go missing or are absent from education; and the role of the Designated Safeguarding Lead (DSL).
- Know who and how to contact the DSL and any deputies, the Director of Trust Safeguarding and Culture, and the Safeguarding Link Governor.
- All staff will be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
    - who may need a social worker and may be experiencing abuse or neglect.
    - requiring mental health support.
    - may benefit from early help.
    - where there is a radicalisation concern.
    - where a crime may have been committed.
- Be clear as to the setting's policy and procedures about child-on-child abuse, children missing or absent from education and those requiring mental health support, and the impact of technology in relation to online safety including online filtering and monitoring processes.
- Be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- Record concerns appropriately and in a timely manner by using the setting's safeguarding systems.
- Be aware of the need to raise to the senior leadership team any concerns they have about safeguarding practices within the school.

- Recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Staff understand such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff are alert to the signs and impact of prejudice-based harm and ensure that concerns are considered within safeguarding practice where appropriate.
- **Prejudice-based harm:** Staff recognise that children may experience racism, faith-based prejudice and other discrimination. They understand the potential impact on welfare, wellbeing, mental health and help-seeking, and will identify, record and address relevant concerns through safeguarding procedures.
- **EYFS safer recruitment:** No individual will begin working or volunteering in regulated activity with EYFS children, including Reception, until the required suitability and safer recruitment checks have been completed. This includes an enhanced DBS check with a check of the children's barred list.
- **Female Genital Mutilation (FGM):** Teachers have a **personal statutory duty** to report directly to the police when a girl under 18 discloses that FGM has been carried out on her, or where the teacher observes physical signs indicating that it has been carried out. Reporting the matter to the DSL does not fulfil this personal duty. The DSL or Deputy DSL should also be involved, unless there is good reason not to do so, to support the safeguarding response. Suspected or at-risk cases that do not trigger the mandatory reporting duty will be dealt with through the school's usual safeguarding procedures.

1.5.2 - Role of the Designated Safeguarding Lead (DSL) and Deputies (DDSL)

Duties are further outlined in Keeping Children Safe in Education (2026, Annex B)

Details of our DSL and Deputy DSL and how to contact them are available on the Trafalgar School at Downton website, our newsletters, the notice board in reception and on posters throughout the school. **We also have a confidential safeguarding mailbox- safeguarding@trafalgar.wilts.sch.uk**

- The DSL is a senior member of staff who undertakes lead responsibility for safeguarding and child protection within the setting.
- The DSL (and any deputies) have undertaken the Wiltshire Council Advanced Child Protection Training to ensure they are compliant with the Wiltshire Council requirement for DSLs.
- The DSL works with the Headteacher, and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that learners in need are experiencing or have experienced, and identifying the impact that these issues might be having on learner's attendance, engagement and achievement at school or college.
- Activities include the management of work undertaken by any Deputy DSLs.
- Manages early identification of vulnerability of learners and their families from staff through cause for concerns or notifications. This will ensure detailed, accurate, secure written records of concerns and referrals.
- Manages referrals to local safeguarding partners where learners with additional needs have been identified. These can include those –
    - who need a social worker and may be experiencing abuse or neglect.
    - requiring mental health support.
    - who may benefit from early help/family help.
    - where there is a radicalisation concern.
    - where a crime may have been committed.

The DSL will also:

- Work with others – acting as a point of contact for outside agencies about safeguarding.
- Support and advise other staff in making referrals to other agencies.
- When required, liaise with the case manager and the Local Authority Designated Officer (LADO) Service in relation to child protection cases which concern a staff member.

- Coordinate regular safeguarding training and updates and raise awareness and understanding to the school community around policies and practice in relation to safeguarding.
- Help promote educational outcomes by sharing information about vulnerable learners with relevant staff. This includes ensuring that staff:
    - know who these children are,
    - understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
    - Are supported to identify the challenges that children in this group might face.
    - Provide additional academic support or make reasonable adjustments to help children who have **or have had** a social worker to reach their potential.
- Ensure the secure transfer of the Child Protection File when a child moves to a new setting-within 5 days for in year transfer or the first 5 days of the start of a new term.
- Arrange adequate and appropriate cover arrangements for any out of hours/out of term activities, e.g. attendance at Strategy and Initial Child Protection Conferences out of term time and share out of term time contact details with the Local Authority.
- Work with the SLT member who has lead responsibility filtering and monitoring systems to monitor and ensure their effectiveness and know how to escalate concerns when identified. Support the Filtering and Monitoring lead in conducting an annual review on filtering and monitoring.
- Support the role and duties of the named lead for health, safety and site security.
- Understand and reflect the views, wishes and experiences of children.

1.5.3 Role of the Director of Trust Safeguarding and Culture:

Duties are further outlined in Keeping Children Safe in Education (2026, Part 2)

The Director of Trust Safeguarding and Culture is responsible for ensuring that the setting fulfils its safeguarding obligations, and that safeguarding and child protection policies, procedures, and practices, including online safety, are effective and compliant with relevant legislation, statutory guidance, and local safeguarding partnership arrangements.

- The Director of Safeguarding and Culture will liaise with the Headteacher and the DSL to produce an annual report for governors and complete the annual S175/157 safeguarding audit from Wiltshire Council.
- Ensure that the school remedies any actions brought to its attention without delay.
- Ensure that this document is updated annually (or when there are significant updates)
- Ensure that the DSL is an appropriate senior member of the school's senior leadership team and ensure that they have the appropriate status, authority, skills and experience within the school to carry out the duties of the post.
- Ensure that they attend Wiltshire training and that safeguarding learning for the school community is robust and effective.
- Ensure that learners are taught about safeguarding on the curriculum including online safety in compliance with statutory guidance Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk)
- Ensure that teachers, including supply teachers, trainee teachers, other staff, volunteers, and contractors have appropriate checks carried out in line with statutory guidance Keeping Children Safe in Education (DfE 2026, Part 3).
- Ensure that there are procedures in place to manage safeguarding concerns or allegations against teachers, including supply teachers, other staff, volunteers, and contractors who may not be suitable to work with or pose a risk to learners, this includes having a process to manage low level concerns.
- Ensure that systems are in place for learners to effectively share a concern about a safeguarding issue they are experiencing, express their views and give feedback.

- Ensure that the setting has systems in place to prevent, identify and respond to child-on-child harm (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices including filtering and monitoring.
- Appoint a designated teacher to promote the educational achievement for children in care and other care arrangements.
- Receive an annual filtering and monitoring assurance report and review the effectiveness of arrangements.

1.5.4 The Headteacher

The Headteacher ensures that the policies and procedures, adopted by the Trust Board and Academy Governance Committee (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff and should be easily understood by staff, children and parents, by re-visiting regularly.

The Headteacher reports regularly to the Academy Governance Committee around the effectiveness of the school's safeguarding procedures, and in particular, child-on-child incidents, including all aspects of trend analysis. The school's approach to online safety and filtering and monitoring is reviewed annually as a minimum.

Safeguarding is an agenda item for every Academy Governance Committee meeting and is reviewed regularly at Trust Board meetings.

The Headteacher ensures that safeguarding is an agenda item for every staff meeting.

This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance.
The nominated link governor meets the DSL twice a year to monitor the effectiveness of this policy.

1.5.5 Role of the Academy Governance Committee

- Read and understand Part 1 of *Keeping Children Safe in Education* (2026) and Annex A.
- Monitor pupil attendance, behaviour, mental health and wellbeing.
- Approve this policy at each review (or earlier if there are updates) and ensure that it complies with the law.
- Hold the Headteacher to account for the implantation of the Safeguarding and Child Protection Policy and associated procedures.

1.5.6 The Magna Learning Partnership Central Team will:

- Read and understand Part 1 of *Keeping Children Safe in Education* (2026), and Annex A.
- Liaise with Director of Trust Safeguarding if they become aware of any concerns that are not being appropriate addressed or resolved in school.

1.5.7 Magna Learning Partnership Trust Board

The Trust Board will:

- Take overall strategic responsibility for the safeguarding practices across the Trust, holding the CEO to account.
- Read and understand Part 1 of KCSiE 2026, and Appendix A – Key Guidance for safeguarding issues and follow their duties as 'the proprietor'.
- Have a strategic overview of safeguarding and child protection issues across the Trust.

1.6 Safeguarding training for staff

Academy governance committees and proprietors will ensure that all staff members undergo safeguarding and child protection (including online safety and cybersecurity) training at induction.

1.6.1 - All staff:

- Will receive appropriate safeguarding and child protection refresher training at least annually (via formal training, email e-bulletins and staff meetings).
- Will receive online safety and cybersecurity training annually.
- Must complete Female Genital Mutilation (FGM) awareness training and will understand their legal duty under the Mandatory Reporting Duty.
- Must complete PREVENT awareness training annually. This is to ensure that they can comply with the legal expectations under the PREVENT duty.
- Will receive training which includes clear reference to staff codes of behaviour and professional boundaries, and on the reporting of low-level concerns, internal whistleblowing policy and guidance for escalation. All staff should receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

1.6.2 - Designated Safeguarding Lead and deputies:

- Will undergo formal training provided by the Wiltshire Council to provide them with the knowledge and skills and training (including online safety) required to carry out the role. The training will be updated every two years.
- Deputies will be trained to the same level as the DSL.
- The DSL and any deputies will liaise with the SVPP and SEA team to ensure that their knowledge and skills are updated. This could be via e-bulletins, attending DSL forum meetings, attending additional training and taking time to read and digest safeguarding developments.

1.6.3 - Other training considerations:

- The academy governance committee will ensure that at least one person on any appointment panel will have undertaken safer recruitment training, in line with School Staffing (England) Regulations 2009.
- Members of the senior leadership team will make themselves aware of and understand their role within the local safeguarding arrangements. This will ensure that those who have responsibility for the management of behaviour, inclusion, Special Educational Needs, attendance, and exclusions will carry out their duties with a safeguarding consideration.
- The Designated Teacher for Children in Care will undergo appropriate training to fulfil their role to promote the educational achievement of registered pupils who are in care.
- The mental health lead has access to appropriate training.
- Training around safeguarding issues in Annex A (including online safety and filtering and monitoring) will be integrated, aligned, and considered as part of a whole school safeguarding approach.
- Staff who are likely to need to use reasonable force and/or other restrictive interventions should be adequately trained in its safe and lawful use and in preventative strategies.
- Governors and trustees receive appropriate safeguarding and child protection training at induction and annually thereafter.

1.7 Safeguarding in the curriculum

The Trafalgar School at Downton is dedicated to ensuring that children are taught about how to keep themselves and others safe, including online. We recognise that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND). This is part of a broad and balanced curriculum. This includes:

- Working within statutory guidance in respect to Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk).

- Working within statutory guidance in Personal, Social, Health and Economic (PSHE) education, to explore key issues at an age-appropriate stage such as:
    - healthy and respectful relationships
    - boundaries and consent
    - stereotyping, prejudice and equality
    - body confidence and self-esteem
    - how to recognise an abusive relationship, including coercive and controlling behaviour
    - the concepts of, and laws relating to - sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called 'honour'-based violence such as forced marriage and FGM, and how to access support, and
    - what constitutes sexual harassment and sexual violence and why these are always unacceptable.
- A whole-setting preventative education approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict.
- Appropriate filtering and monitoring systems are in place to ensure that 'over- blocking' does not lead to unreasonable restrictions as to what children can be taught about online teaching and safeguarding. (Further information can be found in KCSIE 2026)
- The curriculum will be shaped to respond to safeguarding incident patterns in the setting identified by the DSL and safeguarding team (e.g., to respond to an increase in bullying incidents).
- Providing engagement opportunities with parents and carers to consult on key aspects of the curriculum.
- Enabling learners to inform the curriculum via discussions with the student council, pupil voice and student body.

1.8 Safer recruitment and safer working practice

1.8.1 – Safer recruitment

The Trafalgar School at Downton pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education, Part Three' (2026), ensuring we maintain an accurate Single Central Record.

- This includes scrutinising applicants, by verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and identifying any gaps within this, and ensuring that a candidate has the health and physical capacity for the job. References are always obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed.
- It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity. An enhanced DBS with barred list check will be completed for all volunteers taking part in regulated activity in line with The Crime and Policing act 2026.
- Applicants must provide an application form, and Curriculum Vitae will not be accepted as a stand-alone.
- As a setting we will conduct online searches as part of our due diligence checks on short listed candidates and inform them of this.
- All recruitment materials will include reference to The Trafalgar School at Downton's commitment to safeguarding and promoting the wellbeing of learners.
- Where applicable, third-party assurances are sought for contractors who are required on site, including identification checks on arrival.
- Under no circumstances will a volunteer/employee/contractor on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

1.8.2 – Work Experience

Where a person supervising a child on a work experience placement for a child under the age of 16, provides teaching, training, instruction, care or supervision frequently, on more than 3 days in a 30-day period, or overnight, this is regulated activity and an Enhanced DBS with barred list check will be requested.

The Trafalgar School at Downton cannot request an enhanced DBS check with barred list information from a work experience provider for staff supervising children aged 16 to 17; instead, The Trafalgar School at Downton will seek assurance that the placement provider has appropriate safeguarding policies and procedures in place before any placement begins.

1.8.3 – Visitors

All visitors complete a signing in/out process, wear a school ID badge and are provided with key safeguarding information including the contact details of safeguarding personnel in school.

Scheduled visitors in a professional role (e.g. fire officer, police, LA staff) are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at school. Careful consideration is given to the suitability of any external organisations. Professionals may also be required to provide a letter of assurance from their organisation that safer recruitment checks have been completed.

If the visit is unscheduled and the visitor is unknown to the school, we will contact the relevant organisation to verify the individual's identity and confirm the reason for the visit.

1.8.4 – Site Safety

Risk assessments are undertaken and maintained in accordance with the school's health and safety policy. The school ensures that when our premises are hired or rented to other organisations (ASC, evening and weekend clubs) including shared site providers who work with children, those organisations adhere to the guidance for out-of-school settings. After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK (www.gov.uk)

Where the school's premises are hired or rented to another organisation, [Name of school] will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place, including inspecting these where needed, and will ensure there are arrangements for the provider to liaise with the school on safeguarding matters. Safeguarding requirements will be included as a condition of use in any lease or hire agreement, and failure to comply with this could lead to termination of that agreement.

The school maintains comprehensive emergency preparedness plans to respond to emergencies and critical incidents, in line with the requirements of Martyn's Law. These plans include procedures for evacuation to an alternative premises, invacuation to a designated safe internal area, lockdown arrangements. Regular practice drills are conducted to ensure staff and children are familiar with emergency procedures and can respond effectively.

Child absconding/missing from site

Any incident where a pupil leaves the school site without permission, leaves staff supervision, or where their whereabouts become unknown will be treated as a safeguarding incident. The school's response will be proportionate to the child's age, understanding, vulnerabilities and level of assessed risk. The DSL will be informed immediately, a search of the school grounds should be undertaken, parents/carers contacted, and where vulnerability factors are identified, the police and Children's Social Care will be notified. All incidents will be recorded as safeguarding, reviewed and used to inform future risk assessment and safeguarding planning.

1.8.5 – Off site visits and exchange visits

We carry out a risk assessment prior to any off-site visit and designate the specific roles and responsibilities of each adult, whether employed or volunteers.

1.8.6 - Use of restrictive interventions

At The Trafalgar School at Downton our aim is to create a safe, secure and supportive environment for all our pupils and staff. There are times when the use of restrictive interventions, including reasonable force and seclusion, is lawful and necessary to keep people safe. However, we understand that the use of restrictive interventions can have a significant impact on pupils, staff and parents/carers. In our school, they are only ever considered as a last resort, once all other prevention and de-escalation strategies have been exhausted.

- The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation and will follow government guidance Use of reasonable force and other restrictive interventions guidance
- There is robust recording and reporting of any incident where restrictive interventions including reasonable force and seclusion have been used. Further review of the incident is carried out to reflect on how the incident could be avoided, this will involve the child and their family.
- Further details can be found in our behaviour policy/use of restrictive interventions policy; Policies | The Trafalgar School

1.8.7 - Whistleblowing procedures

Staff are aware of the following whistleblowing channels for situations where they feel unable to raise an issue with the senior leadership team or feel that their genuine concerns are not being addressed:

- General guidance can be found at: Advice on whistleblowing https://www.gov.uk/whistleblowing.
- The NSPCC whistleblowing helpline is available here for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
- The above channels are clearly accessible to all staff (in the staff handbook, code of conduct and staff notice boards).
- MLP Whistleblowing policy can be found on our website; Policies | The Trafalgar School

PART 2: Procedures

2.1 Reporting Concerns

All staff are clear about recording and reporting concerns to the DSL/Deputy DSL in a timely way. In the case a learner is in immediate danger, staff should phone the police.

All staff are aware of and follow the procedures to respond to a concern about a child. This includes responses to child-on-child harm and learners who present with a mental health need.

At The Trafalgar School at Downton children can raise their concerns via **any member of staff who feel comfortable to disclose issues to or via our confidential safeguarding email safeguarding@trafalgar.wilts.sch.uk** and they will be treated seriously.

The Trafalgar School is committed to work in partnership with parents and carers. In most situations, the DSL will discuss initial concerns with them. However, the D/DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

2.2 Information Sharing

The Trafalgar School at Downton is committed to have due regard to relevant data protection principles which allow for sharing (and withholding) personal information as provided for in the Data protection Act 2018, UK General Data Protection Regulations and the Data (Use and Access) Act 2025. This includes how to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.

Staff at the setting are aware that:

- 'Safeguarding' and 'individuals at risk' is a processing condition that allows practitioners to share special category personal data.
- They should refer to Information Sharing for Safeguarding Practitioners 2024.

There may be times when it is necessary to share information without consent such as:

- To gain consent would place the child at risk,
- by doing so will compromise a criminal investigation,
- It cannot be reasonably expected that a practitioner gains consent,
- or, if by sharing information it will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent.

There are also times when The Trafalgar School at Downton will not provide pupil's personal data where the serious harm test under legislation is met, (by sharing the information the child may be at further risk). When in doubt The Trafalgar School at Downton will seek legal advice.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

2.3 Identifying and monitoring the needs of vulnerable learners

The DSL and Deputy DSL will regularly review and monitor those children who have been identified as vulnerable and those children who are potentially at greater risk or harm. This can include reviewing attendance data, behaviour data, attainment data and safeguarding records. This is to ensure that:

- Proportionate and early interventions can be taken to promote the safety and welfare of the child and prevent escalation of harm.
- Information is shared with teachers and school and college leadership staff to promote educational outcomes.
- Learners who currently have, or have had, a social worker, including those in kinship care, will have their academic progress and attainment reviewed and additional academic support will be provided to help them reach their full potential.
- Reasonable adjustments are made in relation to school-based interventions – for example responding to behaviour.

2.4 Multi-agency working

We recognise that education providers have daily contact with most children and families, and we are uniquely placed to identify concerns and, with partners as appropriate, address them early.

The Trafalgar School at Downton will work together with appropriate agencies to safeguard and promote the welfare of children including identifying and responding to their needs. This is in compliance with statutory guidance Working Together to Safeguard Children 2026.

All staff are aware of the criteria and process for community-based Family Help assessments including the level of need, for when a case should be referred to Family Help support and services provided at:

- Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
- Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)

All staff are aware of the criteria and process, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)

- Section 31 of the Children Act 1989 (care and supervision orders), and
- Section 20 of the Children Act 1989 (duty to accommodate a child)

Referrals in these cases should be made by the DSL (or Deputy DSL) to Children's Social Care in the Local Authority in which that child resides.

The Trafalgar School at Downton will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes providing written reports and ensuring representation at inter-agency meetings such as integrated support plan meetings, initial and review child protection conferences and core group meetings.

2.4.1 Additional considerations:

- Where a learner and/or their family is subject to an inter-agency child protection plan or a multiagency risk assessment conference (MARAC) meeting, the setting will contribute to the preparation, implementation, and review of the plan as appropriate.
- In situations where a child in care may be put on to part-time timetable, the school will consult with relevant agencies and the virtual school.
- If a crime has been suspected or committed that involved the bringing of an offensive weapon on to the school site, the setting will liaise with the Police who will consider a proportionate response.
- If there is a risk of harm, the police should be called via 999. For other concerns of criminality, the non-statutory guidance when-to-call-the-police--guidance-for-schools-and-colleges.pdf (npcc.police.uk) can be helpful or contact the local PCSO/School Link Officer/Neighbourhood Team.
- If we are managing a critical incident involving a child, IFD and MLP Central Team will be contacted Critical Incident Support | Right Choice

A critical incident may be defined as any sudden and unexpected incident or sequence of events which cause trauma within a school community, and which overwhelms the normal coping mechanisms of that setting.

Critical Incidents affecting settings may include:

- Property failure
- The death of a pupil(s) or member(s) of staff through sudden accident, murder, terminal illness or suspected suicide.
- A serious accident involving pupils and setting personnel on or off premises.
- A violent attack or violent intrusion onto premises, e.g., involving an armed intruder or a bomb alert.
- Fire, flood, building collapse or major vandalism in setting.
- A hostage situation.

- A significant event in the community, e.g., transport accident, terrorism.

Whatever the scale of the incident, the effect on the individuals involved can be equally devastating. Further advice and guidance can be found here Critical Incident Support | Right Choice

2.5 Suspensions, permanent exclusions and commissioning of Alternative Provisions

(To be read in conjunction with the Behaviour Policy and Suspensions and Exclusions Policy.)
The Trafalgar School at Downton recognises that children who are suspended or permanently excluded may be vulnerable to a range of safeguarding concerns and that such actions can increase a child's risk of harm, exploitation, poor mental health, serious violence, criminal involvement, and becoming missing from education.

The school will ensure that safeguarding remains central to all decision-making relating to suspensions and permanent exclusions. Staff will consider whether a child's behaviour may be an indicator of unmet safeguarding needs, abuse, neglect, exploitation, trauma, mental health concerns, family difficulties, or special educational needs and disabilities (SEND).

The Trafalgar School at Downton will exercise their legal duties in relation to their interventions. This includes:

- whether a statutory assessment should be considered in line with the principles of Children Act 1989,
- that decisions are made in an anti-discriminatory manner in line with the Equality Act 2010 (including having regard to the SEND Code of Practice)
- and takes into consideration the learner's rights under the Human Rights Act 1998.
- Interventions will be consistent with statutory guidance School suspensions and permanent exclusions - GOV.UK (www.gov.uk)

2.5.1 - Actions to take

- Ensure safeguarding considerations form part of all decision-making processes.
- Consider whether behaviour is linked to an underlying safeguarding concern or unmet need.
- Involve the Designated Safeguarding Lead (DSL) where safeguarding concerns are identified, suspected, or known.
- Consider whether Early Help, Children's Social Care, mental health support, or other multi-agency interventions are required.
- Notify the Statutory Virtual School of a suspension or permanent exclusion of a Looked After Child
- Remain alert to the heightened risk of children who are suspended or permanently excluded becoming missing from education, experiencing child criminal exploitation, child sexual exploitation, or becoming involved in serious violence.
- Work collaboratively with parents/carers, the local authority, alternative providers, and other relevant agencies to promote the child's safety and welfare.
- Ensure that safeguarding arrangements remain effective throughout any suspension period and during transitions to alternative provision or other educational settings.
- Transfer child protection records, safeguarding files, risk assessments, and any other relevant welfare information securely and without delay when a child moves to another education provider following permanent exclusion.

The school acknowledges that a permanent exclusion should never be viewed solely as a behaviour matter and will take all reasonable steps to identify, assess, and address any underlying safeguarding vulnerabilities affecting the child.

2.5.2 - Commissioning Alternative Provisions

When commissioning Alternative Provision we will have regard to statutory and non- statutory guidance:
Alternative provision - GOV.UK
Non-school alternative provision: voluntary national standards - GOV.UK
Education for children with health needs who cannot attend school - GOV.UK (www.gov.uk)

In accordance with KCSIE 2026, if a pupil who is on role at The Trafalgar School at Downton attends an Alternative Provision, we will continue to be responsible for the safeguarding of that pupil and ensure that we are satisfied that the provision is meeting the needs of the pupil.

Before one of our pupils attends an alternative provision, we will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff. The school will remind the provider of their duty to notify us of any staff changes or risks.

We understand that good practice highlights the importance of a member of school staff visiting the setting before placement is confirmed, to meet the provider, carry out visual checks and complete an Individual Placement Agreement.

We will ensure there is a clear agreement of roles and responsibilities to maintain safeguarding and daily monitoring of attendance arrangements for learners who are not taught on site.

An accurate record will be kept of where the child is, including all sites attended through Alternative Provision.
When a child, who is on role at The Trafalgar School at Downton is attending an alternative provision, half-termly visits will be undertaken by a member of school staff to see that child to ensure the safety and suitability of the provision.
Where possible, we will always look to use an alternative provision that are on Wiltshire Alternative Provision Approved Register Alternative Provision Service Information | Right Choice

If a safeguarding concern arises for a child within their Alternative Provision, the school will look to immediately review or end the placement.

2.6 Children Missing from Education

(To be read in conjunction with the Attendance Policy.)
A learner missing or absent from education is a potential indicator of abuse or neglect, or maybe an indicator of need for early help support. Staff should follow procedures for unauthorised absence and for dealing with children that go missing or are absent from education, particularly on repeat occasions. These should be reported to the DSL and reviewed in line with 2.3 Identifying and monitoring the needs of vulnerable learners.
The Trafalgar School at Downton will follow the guidance detailed in Children Missing Education (2016), Working together to improve school attendance 2026 and Wiltshire Council policy for Children Missing from Education. We will comply with submitting attendance returns to the Local Authority within the agreed timescales.
This will include notifying the local authority in which the child lives:

- of any pupil who fails to attend school regularly,

- or has been absent without the school's permission for a continuous period of 10 school days or more,
- or who has been recorded with code I (illness) and who the school has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness.

2.6.1 - Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, The Trafalgar School at Downton and other key professionals will work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child is subject to a child protection plan or has an Education, Health and Care plan this will need to be reviewed with the local authority, working closely with parents and carers.

In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024 The Trafalgar School at Downton will notify the Local Authority when a pupil's name is deleted from the admission register. Safeguarding concerns will be shared with the Education Welfare Service and where required, a request for additional support from children's services will be made in line with the Children Act 1989.

2.7 Responding to allegations of abuse made against adults working in the setting

Staff must report any concerns or allegations about a professional's behaviour (including supply staff, trainee teachers, volunteers, and contractors and those from organisations or individuals using the school premises) where they may have:

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

On being advised of an allegation which meets any or all of the above criteria, the designated safeguarding lead / case manager (schools) should contact the Local Authority Designated Officer (LADO) within **ONE working day**

2.7.1 - Immediate action must be taken:

- Do not speak to the individual it concerns.
- Allegations or concerns about colleagues and visitors must be reported directly to the Head Teacher who will follow guidance in Keeping Children Safe in Education (DfE 2026, Part four: Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors).
- If the concern relates to Head Teacher it should be reported to the Director of Education, who will liaise with the Local Authority Designated Officer (LADO) - Wiltshire Council and they will decide on any action required.
- If there is a conflict of interest which inhibits this process of reporting, staff can report directly to the LADO.
- If allegations are regarding a member of supply staff, the school will take the lead and progress enquiries with the LADO, whilst continuing to engage and work with the employment agency.
- Where allegations concern a trainee teacher, the school will progress the matter with the LADO in the same way as for any other member of staff, while continuing to liaise with the initial teacher training (ITT) provider (KCSIE 2026, Part Four).
- Allegations regarding foster carers should be referred to the LADO on the day that the allegation is reported. The allocated social worker should also be informed on the day. The school should not undertake any investigation unless the LADO advises this.

2.7.2 - Low level concerns

This should be read in conjunction with the staff code of conduct and Keeping children Safe in Education (2026). A low-level concern is not insignificant. This process should be used in events where a concern about professional conduct does not meet the threshold set out at the beginning of this section.

The setting provides a clear procedure for sharing low level concerns. Reports should be made to the DSL (or the head teacher if it is regarding the DSL).

- The Trafalgar School at Downton creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.
- The DSL will address unprofessional behaviour and support the individual to correct it at an early stage providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- The DSL will review and correct any deficits in the setting's safeguarding system.

2.8 Children at greater risk of harm

Whilst all children should be protected, all staff and governors recognise that some groups of children are potentially at greater risk of harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups.

- Children who need a social worker
- Children who are absent from education
- Elective home Education
- Children requiring mental health support
- Looked after children and previously looked after children
- Care leavers
- Young carers
- Children in the court system
- Children affected by parental offending/imprisonment.
- Children in Kinship Care
- Children with special educational needs, disabilities or health issues
- Children with medical conditions
- Children who are lesbian, gay or bisexual
- Children who are questioning their gender
- Children with Special Education Needs and Disabilities (SEND) or physical health issues. The Trafalgar School at Downton never assumes that behaviour, mood or injury relates to the child's additional needs without further exploration.

There are also specific areas of safeguarding that can impact on children and families and their ability to keep safe:

- Child Exploitation- including both Child Sexual Exploitation and Child Criminal Exploitation and county lines, modern day slavery and trafficking
- Cybercrime
- Domestic Abuse
- Homelessness
- Honour or faith-based abuse (including Female Genital Mutilation and Forced Marriage),
- Online Safety
- Mental health
- Child on child abuse

- Radicalisation
- Serious Youth Violence
- Substance Misuse
- Private Fostering

Additional information about key safeguarding areas can also be found in Keeping Children Safe in Education Annex A (DfE 2026); the NSPCC website - Types of Abuse. Localised resources for education settings can be accessed through Wiltshire's Safeguarding Effectiveness Resource Page | Right Choice

2.9 Responding to incidents of child-on-child abuse (including harassment and violence) and extra- familial safeguarding concerns

2.9.1 Child-on-child abuse

All children have a right to attend school and learn in a safe environment. All child-on-child abuse is unacceptable and will be taken seriously. In addition, we have a zero-tolerance approach and will respond to all reports and concerns of child-on-child abuse and child-on-child sexual violence and sexual harassment, including those that have happened outside of the school, and/or online.

Child-on-child abuse is not tolerated, passed off as "banter" or seen as "part of growing up". The different forms of child-on-child abuse is likely to include, but not limited to:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents
- abuse in intimate personal relationships between peers (teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- causing someone to engage in sexual activity without consent
- initiation/hazing type violence and rituals.

We recognise that, for some (but not all) forms of child-on-child abuse, it is more likely that girls will be victims and boys perpetrators; however, all child-on-child abuse is unacceptable and will be taken seriously regardless of the sex of those involved (KCSIE 2026, para 191).

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, who may themselves need support; it is preventable, and staff have a responsibility to report any concerns to the DSL regardless of whether the incident happened on or off site.

Sexual harassment and violence between children can be linked to wider cultures of misogyny; **The Trafalgar School at Downton** will consider this link when planning its curriculum and pastoral response.

Consequently, child-on-child abuse is dealt with as a safeguarding issue and recorded as such, not managed through the systems set out in the behaviour policy.

- Any child who may have been victimised and/or displayed such harmful behaviours, along with any other child affected by child-on-child abuse, will be supported through the setting's safeguarding team and pastoral system and the support will be regularly monitored and reviewed.
- We will address inappropriate behaviour (even if it appears to be relatively innocuous) as this can be an important intervention that may help prevent problematic, abusive and/or violent behaviour in the future.
- We acknowledge that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Staff maintain an attitude of 'it could happen here' where safeguarding is concerned.

We minimise the risk of child-on-child abuse by providing:

- a relevant, effective curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. The curriculum is updated to reflect changes in legislation, and the mandatory teaching of Relationship Education, Relationship and Sex Education and Health Education,
- established/publicised systems for children to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously,
- training to all staff so they understand that child-on-child abuse can and does happen and are trained to be alert to any behaviours that could cause concern,
- a clear procedure for all staff to report all incidents as a safeguarding concern to the school DSL/ Deputy DSL.

2.9.2 Child-on-child sexual harassment and sexual violence

The DSL will follow local and national guidance when there has been signs, reports or concerns of Harmful Sexual Behaviour (HSB), child-on-child sexual harassment and sexual violence having due regard of Part 5 of Keeping Children Safe in Education. This will include liaising with other professionals to develop robust risk and needs assessments and multi-agency safety planning with appropriate specialist targeted work for children who are identified as posing a potential risk to other children.

The Wiltshire Harmful Sexual Behaviours protocol Wiltshire Safeguarding Vulnerable People Partnership (SVPP) - Policies and guidance should be utilised to inform assessment of risk and what actions to subsequently take. Any assessments need to take an extra-familial safeguarding approach to consider risks posed by any wider environmental factors present in a child's life. The DSL will record specifically the time and location of the incident, and any action required to make the location safer.

The Trafalgar School at Downton will consider sexual harassment in broad terms. Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

When an incident involves an act of **sexual violence** (rape, assault by penetration, or sexual assault) the starting point is that this should be passed on to police **regardless** of the age of criminal responsibility (10 years old). This must be reported directly via 101 for recording purposes and accountability. A concurrent referral to social care must also be made.

Where a report includes an online element, we will follow Searching, screening and confiscation at school - GOV.UK (www.gov.uk) and Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

- The NSPCC has a dedicated helpline 0800 136 663 to provide children who are victims of sexual abuse in schools with appropriate support and advice. The helpline also provides support to parents and professionals.

- The Lucy Faithfull Foundation can provide support to anyone with concerns about child sexual abuse Helpline - Stop It Now
- The Lucy Faithful Foundation's, Shore Space, offers a confidential chat service for teenagers worried about sexual behaviour. Home - Shore

2.9.3 Extra familial safeguarding approach to child-on-child abuse:
The Trafalgar School at Downton will minimise the risk of child-on-child abuse by understanding extra-familial risks and will increase safety in the contexts of which harm can occur – this can include the school environment itself, peer groups and the neighbourhood.
Following any incidents of child-on-child abuse, the DSL will review and consider whether any practice or environmental changes can be made in relation to any lessons learned. This can include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics in the curriculum.

ROTH (Risk Outside The Home Wiltshire Safeguarding Vulnerable People Partnership (SVPP) - Policies and guidance
Schools and colleges have an important role to play in supporting the mental health and wellbeing of their learners.

2.10 Mental Health and wellbeing

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and or may require early help support or the involvement of a more specialist service.
This can include self-harm, signs of an eating disorder, suicidal ideation or suicide. Where a mental health concern may indicate that a child is suffering, or is at risk of suffering, abuse, neglect or exploitation, staff will follow the setting's usual safeguarding reporting route to the DSL without delay, so the concern can be assessed alongside any other information held about the child (KCSIE 2026, para 225).

The Trafalgar School at Downton will ensure that preventative measures in terms of providing safeguarding on the curriculum will provide opportunities for learners to identify when they may need help, and to develop resilience.
The setting will take a 'whole school approach' to:

- deliver high-quality teaching around mental health and wellbeing on the curriculum.
- having a culture that promotes mental health and wellbeing;
- having an environment that promotes mental health and wellbeing;
- making sure children and staff are aware of and able to access a range of mental health services;
- supporting staff wellbeing
- And being committed to child and parent participation

The Trafalgar School at Downton:

- Has a senior mental health lead who supports the development of knowledge and acts as a point of expertise to promote the wellbeing and mental health of learners. They have sufficient training in mental health **and** safeguarding for them to carry out their role effectively.
- Reviews attendance, behaviour, attainment, and safeguarding records at least on a termly basis to enable early identification of vulnerability to mental health problems
- Ensures that learners can report and share concerns in line with section 2.1 Reporting a concern of this policy.
- Ensures staff follow a safeguarding process in terms of reporting concerns so the DSL (and wider members of the safeguarding team such as the SENDCo) can assess whether there are any other vulnerabilities can be identified and proportionate support considered.

- Responds to the immediate health and safety of a learner who is displaying acute mental health distress. This may require support from emergency services via 999 if the leaner is at risk of immediate harm.
- The DSL will consider whether a case can be managed internally, through early help, or should involve other agencies as required in line with section 2.4 - Multi-Agency Working.
- Communicates and works with the learner and parents/carers to ensure that interventions are in the best interests of the child.
- The DSL liaises with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem – DSLs and the senior leadership team access specialist advice through targeted services.

We signpost staff, learners and families to NHS Every Mind Matters and the Hub of Hope, the UK's mental health support database (KCSIE 2026, paras 230-232). Delete as appropriate

2.11 Online Safety

Online safety is an integrated and interwoven theme with other safeguarding considerations. The DSL takes a lead on ensuring that interventions are effective. This means coordinating support and engaging with other colleagues in the setting who may have more technological expertise such as the IT manager of the Head of IT and Data Integrity.
The Trafalgar School at Downton is committed to addressing online safety issues around content, contact, conduct and commerce. This includes:

- Ensuring that online safety is included in relevant policies and procedures.
- Online safety is interwoven in safeguarding training for staff and safeguarding on the curriculum for learners.
- Acknowledging that child on child abuse can happen via mobile and smart technology between individuals and groups. This should be approached in the same process outlined in section 2.7 Responding to incidents of child on child harm **and read in conjunction** with The Trafalgar School's policy on the use of mobile smart technology.
- Provision of education via remote learning will comply with governmental advice Safeguarding and remote education - GOV.UK (www.gov.uk)
- The effectiveness of the setting's ability to safeguarding learners in respect to filtering and monitoring, information security and access management alongside the above will be reviewed annually.
- Preparing children with information for any online challenges and hoaxes, sharing information with parents and where to get help.
- Being alert to emerging online risks, including AI-generated content, deepfakes and 'nudification' apps which can be used to create fake sexual images of a child, and the spread of misinformation and disinformation online.
- Helping children understand how to protect their personal information online and think carefully before sharing images of themselves or others.
- The Trafalgar School at Downton operates as a mobile phone-free environment by default; pupils do not have access to their mobile phone during the school day, including lessons, the time between lessons, breaktimes and lunchtime, other than by exception. [See The Trafalgar School at Downton's Mobile Phone Policy for full details.]
- Paragraph 162 to 182 of Keeping Children Safe in Education highlights additional actions schools should take to keep learners safe online.
- For concerns around individual cases where a child has been harmed through online mediums, advice and guidance can be made through the **Professional Online Safeguarding Helpline**, T: 0344 381 4772, E: helpline@saferinternet.org.uk

- Where there have been established cases of online abuse or grooming, we will alert - **Child Exploitation and Online Protection command (CEOPS)** https://www.ceop.police.uk/ceop-reporting/

2.12 Gender-questioning children

The Trafalgar School at Downton has a statutory duty to safeguard and promote the welfare of all children, including any child who is questioning their gender, as well as their peers, and will consider the impact of any decision on all children affected risk/needs assessments will be considered (further information can be found in KCSIE 2026, para 251-282).

Where a child asks for support with social transition, we will:

- engage parents/carers as a priority and give their views considerable weight, except in the rare circumstances where doing so would place the child at greater risk – in which case the DSL will determine what action is needed to safeguard the child before parents/carers are contacted;
- take a careful approach, recognising that social transition is an active intervention that may have significant effects on a child's wellbeing and longer-term outcomes, and that primary-aged children in particular are very unlikely to be supported in a full social transition;
- consider what is in the best interests of the child and of other children, drawing on clinical and non-clinical professional advice (for example from the SENCo) where relevant, and taking into account any wider health issues or neurodiversity;
- document the decision-making process and keep records, including where a request is not agreed to ensure that toilets, changing rooms, and boarding/residential accommodation designated for one biological sex are not made available to a child of the other biological sex, including as a form of social transition, and
- comply with the setting's duties under the Equality Act 2010 and the Human Rights Act 1998, considering whether any policy would place a gender-questioning child at a disadvantage relative to other children, and linking this consideration to the setting's wider inclusion and equality processes (see section 3, Equalities Statement, of this policy).

2.13 Safeguarding Children with medical conditions

An incident relating to the management of a child or young person's medical condition (including allergies) would not, in itself, warrant a referral to local safeguarding partners. However, we will make a referral to statutory services where an incident indicates the child may be at increased risk of neglect, abuse or exploitation connected to their medical condition – for example, where relevant medical information is not provided to the setting, or a child is repeatedly sent without essential medication.

Further information: DfE statutory guidance Supporting pupils at school with medical conditions, and Allergy safety in schools (KCSIE 2026, para 250).

2.14 Specific actions to take on key safeguarding areas

General or national guidance is not included here. A summary of specific duties are in Keeping children safe in education 2026 **Annex A**. It is recommended that school and college leaders and those staff who work directly with children should read this Annex. Access to local guidance can be found here: Local Guidance, Policies and Flowcharts | Right Choice

In recognition that the threshold of child protection is 'likely to suffer' significant harm, The Trafalgar School at Downton may need to make a referral to children's social care. Where possible, this will involve notifying the parent/carer if it does not place the learner or others at further risk of harm or compromise a criminal investigation. In all other circumstances information will be shared in line with section 2.2 Information Sharing.
It is also important to recognise the importance of liaising with other education settings who may have siblings attending. It is likely that they may hold additional information which will support early identification of harm and in turn develop your assessment of need.

Weapons and Serious violence

We recognise that success in learning is one of the most powerful indicators in the prevention of youth crime.
All staff are aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

- Any member of staff who becomes aware that a pupil is carrying a weapon, has used a weapon, is in possession of a weapon, or has expressed an intention to use a weapon must report this immediately to the Designated Safeguarding Lead (DSL) or a deputy DSL.
- Concerns relating to weapons will be treated as safeguarding concerns and assessed by the DSL in line with the school's child protection procedures.
- The DSL will consider appropriate action, including risk assessment, parental involvement, referrals to children's social care, Early Help, and/or liaison with the police where appropriate.
- The school recognises that possession or use of a weapon may be an indicator of serious violence, child criminal exploitation, gang involvement, or other safeguarding concerns and will respond accordingly.

Child Exploitation – both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

The Trafalgar School at Downton will ensure that early help intervention is provided as soon as a concern of exploitation is identified. We will utilise the SVPP's Wiltshire Safeguarding Vulnerable People Partnership (SVPP) - Policies and guidance and seek advice from targeted services to consider what support may be available. The learner and their families will be part of any planning and interventions.

- If the learner is at risk of CSE or there is intelligence which indicates that the learner or peer group are at risk of CSE, The Trafalgar School at Downton will share information with the police and with the Emerald Team. This information will support proactive activity to disrupt criminal activity in relation to sexual exploitation.
- If the learner is at risk of CCE information should be shared with the police. Targeted support maybe available to disrupt learners from getting involved with criminality.
- Agencies will share 'Missing persons' notifications (when a learner is reported missing from home or care) with education settings with a view to support them to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes. These should be stored securely on the learner's Safeguarding/Child Protection file.

Further support and information can be found here: Preventing Child Sexual Exploitation | The Children's Society

Domestic Abuse

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships.

This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.
Operation Encompass is a national operation where local police forces notify education settings when the police are called to an incident of domestic abuse. Education Settings will be notified when the police have responded to a domestic abuse incident. This will enable the education setting to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes. When a setting is concerned about the amount of police notifications they receive or disclosures of domestic abuse they should consider seeking further advice and completing an Early Help Assessment or DASH to support the family.

The National Domestic Abuse Helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Homepage - National Domestic Abuse Helpline provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.
Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- How to Protect Children From Domestic Abuse | NSPCC
- What is domestic abuse? - Refuge
- Safe Young Lives | Young people & domestic abuse - SafeLives
- Domestic abuse: specialist sources of support - GOV.UK
- Home : Operation Encompass

Female Genital Mutilation

Mandatory reporting duty: Click here for government guidance
There is a legal duty for all professionals undertaking teaching work to report known cases of FGM to the police via 101. This is when they:

1. are informed by a girl under 18 that an act of FGM has been carried out on her; or
2. observe physical signs which appear to show that an act of FGM has been carried out on.

Teachers must personally report to the police where they discover, through a disclosure from the child or visual evidence, that FGM appears to have been carried out on a girl under 18. Informing the DSL does not discharge the teacher's personal statutory duty. Unless there is good reason not to do so, the teacher should also discuss the case with the DSL or Deputy DSL, who will provide support and consider involvement of Children's Social Care as appropriate. Suspected or at-risk cases where FGM has not been discovered will be managed through the school's usual safeguarding procedures.

These cases must be referred to the DSL who will support staff to carry out their duty. It is also advised any referrals made to the police under the mandatory reporting duty is followed up with children's social care, so an assessment of need and support is concurrently considered.

Child Sexual Abuse

Mandatory reporting duty:
There is a legal duty for those taking part in regulated activity to report if they:

- are told that a child (person under the age of 18) has been sexually abused, either by a child or an adult involved
- witness child sexual abuse in person
- see or hear it in the form of images, videos or audio recordings.

These cases must be referred to the DSL who will support staff to carry out their duty. It is also advised any referrals made to the police under the mandatory reporting duty is followed up with children's social care, so an assessment of need and support is concurrently considered.

Generative AI

The Trafalgar School at Downton recognises the safeguarding, data protection and intellectual property considerations arising from the use of Generative AI (whether teacher-facing or pupil-facing) in education. Staff will have regard to the Department for Education's guidance on Generative artificial intelligence in education, and to related sector resources on identifying and mitigating the associated safeguarding risks, when considering the use of AI tools in the setting (KCSIE 2026, paras 165-166). Staff should also be aware that images or videos of a sexual nature generated using AI are treated in the same way as other nudes and semi-nudes for safeguarding purposes (see Key Safeguarding Areas and section 2.7 of this policy).

The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare).

The guidance is set out in terms of four general themes:

- risk assessment,
- working in partnership,
- staff training,
- IT policies.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child:

- under the age of 16 years (under 18, if disabled)
- by someone other than a parent or close relative (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
- with the intention that it should last for 28 days or more.

Cases of private fostering arrangements must be reported to children's social care to ensure that needs are adequately made.

Statutory guidance states that this should be done at least 6 weeks before the arrangement is due to start or as soon as you are made aware of the arrangements. Not to do so is a criminal offence.

Further support and reasonable adjustments should be made by the education setting to promote achievement of positive educational outcomes.

Young Carers

A young carer is a person under 18 who regularly provides emotional and/or practical support and assistance for a family member who is disabled, physically or mentally unwell or who misuses substances. Support for Young Carers can be accessed by completing an EHA.

Sport and single-sex provision

KCSIE 2026 sets out that schools, further education institutions and 16-19 academies (covered by Part 6 of the Equality Act 2010) may separate children by biological sex for single-sex sport and competitive activity where physical strength, stamina or physique would otherwise create a safety or fairness disadvantage. Some sports may need to be single-sex from a certain age for safety reasons, in which case there must be no exceptions. Requests relating to how a child participates will be considered against the guidance on 'considering requests for support with social transition', taking into account the best interests of the child, the impact on other children, and the aim of creating a safe and fair environment (KCSIE 2026, paras 95-98).

Toilets, changing rooms and boarding/residential accommodation

The Trafalgar School at Downton will not allow children into toilets, changing rooms or overnight/boarding accommodation designated for the opposite biological sex, including in response to a request to support social transition.

Separate toilets are provided for boys and girls aged 8 and over, and separate changing accommodation for pupils aged 11 and over, in line with the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

Where a gender-questioning child does not wish to use the facilities designated for their biological sex, The Trafalgar School at Downton will consider whether an alternative, self-contained facility can be provided without compromising single-sex provision for other children. Any such arrangements will be recorded, communicated appropriately, and reviewed regularly.(KCSIE 2026, paras 105-116 and 197-202.