

2026/27 Child Protection and Safeguarding Policy for EPA Trust

Consistent with Keeping Children Safe in Education 2026

This is the overarching Child Protection and Safeguarding Policy for EPA Trust and applies to all schools and settings within the Trust.

Each school must maintain a School Safeguarding Arrangements Appendix setting out its local operational arrangements, including the names and contact details of the school DSL and deputies, local reporting and recording systems, site-specific arrangements and any relevant local contextual safeguarding information. The appendix forms part of this policy and must be readily available to staff.

This policy is based on Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026. The Trust Board, CEO, Trust safeguarding leadership and school leaders will ensure ongoing compliance if statutory or local guidance changes during 2026/27.

Date agreed and ratified by Directing Board – August 2026

Policy status: Trust-wide policy approved by the Trust Board. School-level operational details are recorded in the School Safeguarding Arrangements Appendix.

In this policy:

- School refers to each academy, school or education setting within EPA Trust
- Staff includes employees, agency staff, volunteers, contractors and other adults working on behalf of the Trust; references to governance include Trustees and local governors

The policy will be reviewed and updated at least annually and will also be updated promptly in response to changes in national or local guidance, emerging safeguarding risks, learning from Child Safeguarding Practice Reviews and internal quality assurance activity.

Contents

1. Introduction	4
2. Legislation and Statutory Guidance	5
3. Roles and Responsibilities	5
Trust-wide safeguarding governance and assurance	6
4. Supporting Children	7
Physical abuse:	7
Emotional abuse:	7
Sexual abuse:	8
Neglect:	8
Each EPA Trust school will support all pupils by:	8
5. Procedures for dealing with a concern and Record Keeping	11
6. Managing Child-on-Child Abuse Sexual Harassment, Violence including Harmful Sexual Behaviours (HSB)	13
7. Supporting Children who are Questioning their Gender	14
8. Online Safety and Filtering & Monitoring	15
Filtering and Monitoring	15
9. Concerns and Allegations about staff, including supply staff, trainee teachers, volunteers and contractors	16
10. Information Sharing	16
11. Multi-Agency Working	17
12. Safer Recruitment –	17
13. Training	19
14. Whistleblowing in a Safeguarding Context-	20
15. Site Security	20
16. Quality Assurance	21
17. Policy Review	21
Appendix 1: School Safeguarding Arrangements	22

Key Personnel	Name(s)	Contact details
Trust Designated Safeguarding Lead / strategic safeguarding lead	David Brown	ceo@epa-mat.org
Trust Deputy DSL / safeguarding lead	Sarah Nickelson	sarahnickelson@epatrust.org
Trust Prevent lead	David Brown	ceo@epa-mat.org
Nominated Safeguarding Trustee	Jane Osbourne	JaneJohnson@epatrust.org
Chair of Trustees	Julian Soanes	chair@epa-mat.org
Local Authority Designated Officer (LADO)	Jo Lloyd Sandra Barratt Amie Pilcher	01865 810603 Lado.safeguardingchildren@oxfordshire.gov.uk
Education Safeguarding Advisory Team (ESAT)	ESAT team	01865 810603 ESAT.safeguardingchildren@oxfordshire.gov.uk
Locality Community Support Service (LCSS) worker	LCSS North	0345 241 2703 / lcss.north@oxfordshire.gov.uk
Multi Agency Safeguarding Hub (MASH)		0345 050 7666
Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999

EPA Trust and its schools recognise its responsibility for safeguarding and child protection; this policy must be read, understood and adhered to in conjunction with the requirements for individual roles as stipulated in Keeping Children Safe in Education 2026.

1. Introduction

It is essential that everybody working in a school or college understands their safeguarding responsibilities. Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect, exploitation, and harm. Our school is committed to safeguarding children and aims to create a culture of vigilance. All staff should ensure that any decision made are in the best interests of the child.

EPA Trust and its schools recognise that safeguarding and promoting the welfare of children is everybody's responsibility. Our school adopts a child-centred approach and seeks to ensure that every decision made reflects the best interests of the child. Staff are expected to maintain professional curiosity, recognising that abuse, neglect, exploitation and harm rarely occur in isolation and that multiple vulnerabilities may present simultaneously.

Our trust recognises that children may experience prejudice-based harm and other forms of discrimination. Such harms can have a significant impact on a child's welfare, wellbeing and sense of safety. All staff will be alert to prejudice-based harm, recognise its potential impact and respond appropriately to concerns, including reporting concerns to the Designated Safeguarding Lead where appropriate.

The welfare of children across EPA Trust is our paramount concern. The Trust Board retains overall accountability for safeguarding across the Trust. It will ensure that effective safeguarding arrangements are implemented in every school and that delegated responsibilities are clearly set out within the Trust's governance framework. Local Governing Bodies provide local oversight and assurance in accordance with the Trust's Scheme of Delegation, but this does not remove the Trust Board's overall accountability.

Our safeguarding policy is in keeping with relevant national procedures and local safeguarding arrangements, more details can be found via the [Oxfordshire Safeguarding Children's Partnership](#). [What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Partnership](#)

EPA Trust and its schools recognise the importance of providing help and support as soon as concerns emerge and will work collaboratively with children, families, Family Help services, Children's Social Care and other agencies to ensure children receive the right help at the right time.

This policy applies to all members of staff in each school, including all permanent, temporary and support staff, Trustees and local governors, volunteers, contractors and external service or activity providers.

In line with Working Together to Safeguard Children 2026, each school places the child at the centre of all safeguarding practice. Safeguarding decisions are informed by a clear understanding of the child's lived experience, their wishes and feelings, and the impact of harm on their day-to-day life. All staff are expected to exercise professional curiosity and judgement and to act promptly where concerns are identified.

2. Legislation and Statutory Guidance

This policy is informed by, and has due regard to, the following statutory guidance and legislation:

- Keeping Children Safe in Education DfE, 2026
- Working Together to Safeguard Children DfE, 2026
- Children Act 1989 and Children Act 2004
- Education and Inspections Act 2006
- Education Act 2011
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Children and Social Work Act 2017
- Restrictive interventions, including use of reasonable force, in schools, 2026

This policy also reflects Oxfordshire Safeguarding Children Partnership (OSCP) local procedures and thresholds.

3. Roles and Responsibilities

Each school must have its own Designated Safeguarding Lead (DSL), appointed from the school leadership team, with appropriate status, authority, time, funding, training and resources to carry out the role. The name and contact details of each school's DSL and deputies are recorded in the School Safeguarding Arrangements Appendix. The Trust safeguarding lead provides strategic oversight, support, challenge and quality assurance across EPA Trust; this Trust-level role does not replace the statutory DSL in each school.

The school DSL provides operational leadership for safeguarding within their school, including professional oversight of safeguarding decisions, particularly where concerns are emerging, cumulative or complex. The Trust safeguarding lead supports consistency of practice, facilitates Trust-wide learning and provides professional challenge and escalation where required.

Each school will ensure robust arrangements are in place for safeguarding leadership whenever the DSL is unavailable. Appropriately trained Deputy DSLs will have access to the information and safeguarding systems needed to carry out their role. There must be appropriate safeguarding cover during school hours and for relevant out-of-hours or off-site activities.

The Trust Board and, where functions are delegated, Local Governing Bodies are collectively responsible for ensuring that safeguarding arrangements are fully embedded within each school's ethos and reflected in each school's day-to-day practice.

All staff understand the importance of professional curiosity and challenge in safeguarding practice and are expected to act promptly where there are concerns about a child's safety or welfare.

Our school and Governing Body will ensure that appropriate filtering and monitoring systems are in place and are effective in reducing children's exposure to harmful online content and activity. These arrangements will be proportionate, age-appropriate, risk based and regularly reviewed. The Trust Board and, where functions are delegated, Local Governing Bodies will maintain strategic oversight of filtering and monitoring arrangements and will receive appropriate assurance regarding their effectiveness, at least once per academic year. Filtering and monitoring arrangements form part of each school's wider safeguarding framework and will be considered alongside staff training, curriculum provision, online safety education and risk assessment processes.

The Trust Board and, where functions are delegated, Local Governing Bodies will ensure safeguarding arrangements reflect emerging safeguarding risks including extra-familial harm, attendance related vulnerability, online harms, technology-enabled abuse, exploitation and serious violence.

All staff, Trustees and local governors, volunteers and external providers are expected to identify children who may benefit from additional support, including Family Help, and to raise concerns promptly with the Designated Safeguarding Lead.

EPA Trust and its schools acknowledge the need to treat everyone equally, with fairness, dignity and respect. EPA Trust and Directing Board promote an inclusive and anti-discriminatory whole-school culture as part of our safeguarding responsibilities. Racism, faith-based prejudice and other discriminatory behaviours will be recognised, challenged and responded to appropriately. Children will be supported to understand how to treat others with respect and to understand the impact that prejudice and discrimination can have on others.

Trust-wide safeguarding governance and assurance

The Trust Board is the proprietor and retains collective accountability for safeguarding and promoting the welfare of children across EPA Trust. It approves this policy, receives assurance about its implementation and ensures that safeguarding duties are reflected in the Trust's governance, risk and assurance arrangements.

The CEO is accountable to the Trust Board for ensuring that this policy is implemented across the Trust and that school leaders have the capacity, systems and support required to fulfil their safeguarding responsibilities.

The Trust safeguarding lead provides strategic safeguarding leadership across EPA Trust. This includes supporting and challenging school DSLs, coordinating Trust-wide training and updates, identifying themes and emerging risks, supporting complex cases where appropriate, leading quality assurance activity and reporting safeguarding assurance to the CEO and Trust Board. Operational responsibility for individual pupils remains with the DSL and leadership team of the relevant school, working with statutory agencies as required.

Local Governing Bodies provide local scrutiny and challenge in accordance with the Scheme of Delegation. Each school should have a named safeguarding link governor who meets with the DSL, considers safeguarding assurance information and reports to the Local Governing Body. Local oversight complements, but does not replace, the Trust Board's accountability. Each Headteacher is responsible for implementing this policy within their school, ensuring effective day-to-day safeguarding arrangements, sufficient DSL capacity and cover, appropriate staff training, accurate record keeping, safer recruitment and effective escalation of concerns. Headteachers must provide safeguarding assurance information requested by the Trust.

Each school DSL retains the statutory operational responsibilities set out in Keeping Children Safe in Education 2026. School-specific names, contact details and procedures must be recorded in the School Safeguarding Arrangements Appendix and updated whenever arrangements change.

4. Supporting Children

EPA Trust and its schools understand that safeguarding and promoting the welfare of children is defined by 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.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the child.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Categories of abuse are defined in Keeping Children Safe in Education 2026, and understood by each school as:

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's

developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing, causing, or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Staff across the Trust are aware that safeguarding issues often overlap and can put children at risk of harm, including but not limited to, the categories of above. The following are understood as being potential indicators of risk:

- Drug taking and/or alcohol misuse
- Unexplainable and/or persistent absences from education
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation
- Consensual and non-consensual making or sharing of nudes or semi nudes.

Additional information on these safeguarding issues and information on other safeguarding issues are included in Annex A of Keeping Children Safe in Education 2026.

Each EPA Trust school will support all pupils by:

- Ensuring the curriculum contributes to safeguarding and promotes children's welfare through age-appropriate and developmentally appropriate teaching, including through PSHE, RSHE, Health Education, Computing and other relevant curriculum areas. This will include learning about healthy respectful relationships, consent, online safety, digital resilience, safeguarding, exploitation, discrimination, equality, diversity, misogyny, prejudice, racism, faith-based prejudice and other forms of prejudice-based and discriminatory harm, mental health and wellbeing, harmful sexual behaviour, serious violence, radicalisation, the safe use of technology, including generative artificial intelligence, and how to seek help when concerned about themselves or others.
- Ensuring that safeguarding education is responsive to emerging local and national safeguarding risks and reflects the lived experiences of children.
- Ensuring each school implements and applies mobile phone arrangements in accordance with Department for Education guidance and each school's own mobile phone, behaviour and online safety policies.
- Encouraging pupils to talk about feelings and ensuring they are listened to by a range of appropriate adults.
- Recognising that mental health concerns, self-harm, suicidal ideation, eating difficulties and significant emotional distress may be indicators that a child has experienced or may be at risk of abuse, neglect, exploitation or other safeguarding concerns.
- Ensuring that children know where and how to access support for their mental health and wellbeing within school and through external services where appropriate.
- Recognising that young carers may experience additional safeguarding vulnerabilities including emotional wellbeing concerns, reduced attendance, caring responsibilities and social isolation. Staff will be alert to these needs and will ensure that appropriate support is provided in partnership with families and other agencies.
- Ensuring that children's voices, wishes and lived experiences are central to decision-making and that their views are sought, recorded and taken seriously, in line with Working Together to Safeguard Children.
- Raising and working together with other support services and those agencies involved in safeguarding children, including Family Help and preventative services as required in Working Together to Safeguard Children 2026.
- Recognising that Family Help is a shared responsibility across agencies and that schools play a key role in identifying emerging need, cumulative harm and vulnerability at an early stage.
- Considering the role of family networks, kinship care and protective factors, alongside risks, when assessing need and planning support.

- Recognising that regular attendance is a protective factor and that persistent absence, severe absence, repeated lateness, missing education and disengagement from learning may indicate safeguarding concerns, vulnerability or unmet need.
- Considering intra familial harms and any necessary support for siblings.
- Having a behaviour policy that focuses on early support, prevention and de-escalation, particularly for vulnerable pupils. The policy should make clear that restrictive physical interventions are a last resort and are only used where necessary and proportionate. It also sets out each school's statutory duties to record and report all significant incidents involving the use of force, including timely recording, notifying parents, and reviewing incidents to reduce future risk, alongside clear measures to prevent bullying, including cyber-bullying, prejudice-based, discriminatory bullying, racism and faith-targeted abuse.
- Having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).
- Recognising that children may experience harm beyond their family environment, including child criminal exploitation, child sexual exploitation, serious violence, county lines activity, harmful sexual behaviour, peer abuse and online abuse.
- Recognising that serious violence, weapon carrying, threats of violence, peer conflict and criminal exploitation may present significant safeguarding risks and ensuring concerns are identified and responded to appropriately.
- Alerting the Local Authority if each school is aware of any child being looked after under a Private Fostering arrangement. On admission to school, and at other times, each school will be vigilant in identifying any Private Fostering arrangement.
- Acknowledging that a child that is looked after (CWCF), in kinship care or has been previously looked after by the Local Authority potentially remains vulnerable and ensuring that all staff have the skills, knowledge and understanding to support these children.
- Taking positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with certain protected characteristics to meet their specific need. For example, taking positive action to support girls if there was evidence that they were being subjected to sexual violence or sexual harassment. This includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.
- Recognising that children who are lesbian, gay, bisexual, or gender-questioning may experience bullying, discrimination or vulnerability. Each EPA Trust school will consider each child's individual circumstances, listen to their views, work in partnership with parents wherever appropriate, take account of relevant professional advice and ensure safeguarding decisions are made in the child's best interests.

- Challenging sexist, misogynistic, discriminatory and abusive behaviours and promoting an inclusive anti-discriminatory whole-school culture of respect, equality and safety.
- Recognising that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.
- Recognising that children with medical needs or complex health needs may require additional safeguarding consideration. Staff will remain alert to indicators of abuse, neglect or exploitation and ensure that safeguarding and medical needs are considered together when assessing risk.
- Being aware that where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. Each EPA Trust school will follow DfE guidance on Alternative Educational Provision: Alternative provision - GOV.UK [Alternative provision - GOV.UK](https://www.gov.uk/alternative-provision)

5. Procedures for dealing with a concern and Record Keeping

EPA Trust and its schools recognise any child may benefit from support via universal services, community based Early Help, targeted Family Help prior to statutory services.

Staff across the Trust are alert to the potential need for additional support for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan).
- Has a mental health need.
- Is a young carer.
- Is pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation.
- Is at risk of being radicalised into terrorism.
- Has a parent or carer in custody or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing alcohol and other drugs themselves.

- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.

All staff are aware of the processes for supporting children and families including criteria, referral route and associated legislation including:

- Community-based Family Help assessments:
- Family Help support/Targeted early help (Section 10 and 11 of the Children Act 2004).
- Children in Need including how this applies for disabled children (Section 17 of the Children Act 1989).
- Child protection- when there is reasonable cause to suspect a child is suffering or likely to suffer significant harm (Section 47 of the Children Act 1989).
- Care and supervision orders (Section 31 of the Children Act 1989).
- Duty to accommodate a child (Section 20 of the Children Act 1989).

If a member of staff has a concern about a child or if a child tells them they are being, or at risk of being, abused, exploited or neglected, staff will appropriately respond by listening and offering reassurance. Staff will take account of the wishes and feelings of the child, will not make any promises and will keep the child informed (age appropriate) of the action that will be taken.

Staff should make an accurate and factual record of any concern as soon as possible. Detailing:

- A clear and comprehensive summary of the concern including the child's voice.
- Record of actions taken including consideration of any urgent medical attention.

Staff should ensure that records distinguish between fact, observation, the child's wishes and feelings, information received from others and professional opinion. Where professional judgment has informed decision-making, the rationale for that judgment should be clearly recorded.

Staff should promptly report concerns to the DSL in accordance with level of need identified. In the absence of the DSL or DDSL, staff will refer directly to MASH or the child's social worker (if applicable) and the police (if appropriate) if there is a significant concern.

Each EPA Trust school will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate, and if so, school staff would consult with the DSL and other agencies prior to involving parents. We will record any decision not to discuss with parents and why.

Following receipt of a safeguarding concern for a child, the DSL will:

- Consider if there is a requirement for any immediate action including MASH referral, Police report, medical intervention.
- Ensure that decisions taken, the rationale for those decisions, actions agreed and outcomes achieved are clearly recorded in writing. This includes situations where concerns are monitored, stepped down, or closed, and where referrals are not made.

- Records will demonstrate timely action, professional curiosity, reflective decision-making and how the child's wishes, feelings and lived experience have informed safeguarding assessment, decision making and planning.
- Records will provide a clear chronology of concerns and demonstrate how individual incidents have been considered within the context of any cumulative harm or emerging patterns of risk.

Each school will identify its approved safeguarding recording system and local reporting route within its School Safeguarding Arrangements Appendix. Safeguarding records must be secure, confidential, accessible to authorised safeguarding staff and maintained in accordance with this policy and statutory guidance.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in each school. Safeguarding records are kept in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and in line with Data protection in schools - Record keeping and management - Guidance - GOV.UK Data protection in schools - [Record keeping and management - Guidance - GOV.UK](#)

Safeguarding records will be sufficiently detailed to support effective multi-agency working and enable professionals to understand the child's lived experience, identified risks, protective factors, actions taken, outcomes achieved and the rationale for safeguarding decisions.

All safeguarding records will be transferred securely and without unnecessary delay, in accordance with UK GDPR, data protection legislation, and Keeping Children Safe in Education, to the child's receiving school or setting within five school days. Where safeguarding concerns are significant or complex, the DSL will ensure a direct discussion takes place with the receiving DSL to support continuity of safeguarding arrangements. A record of the transfer will be retained.

The Headteacher will be kept informed of safeguarding concerns by the DSL, if they are not the DSL, and all other staff are informed on a need-to-know basis.

6. Managing Child-on-Child Abuse Sexual Harassment, Violence including Harmful Sexual Behaviours (HSB)

All staff understand that child-on-child abuse includes a wide range of behaviours including bullying (including cyberbullying, prejudice-based and discriminatory bullying), discriminatory behaviour including racism and faith-targeted abuse, sexual harassment, sexual violence, harmful sexual behaviour, misogynistic and misandrist language, weapon-related threats and online abuse.

Such behaviour is never acceptable and should not be tolerated or dismissed as banter, part of growing up or normal behaviour.

Child-on-child abuse can occur between children of any age and sex and can take place both inside and outside of school, online and offline. It may be a one-off incident or a pattern of behaviour and should never be tolerated or dismissed.

EPA Trust and its schools recognise that racist, faith-targeted, prejudice-based and other discriminatory behaviour between children can constitute child-on-child abuse and may have significant impact on a child's welfare, wellbeing and sense of safety. Such incidents will be taken seriously and considered within our safeguarding procedures as well as relevant behaviour, anti-bullying and equality procedures.

EPA Trust and its schools understand that sexual violence and sexual harassment is not acceptable, and we are committed to creating a culture where children feel confident to report concerns, knowing they will be taken seriously.

Harmful sexual behaviours exist on a continuum and range from developmentally appropriate behaviour to problematic, abusive or violent behaviour. Responses are proportionate, child-centred and take account of the needs of both the victim and the alleged perpetrator, recognising that children displaying harmful behaviour may also be vulnerable.

When responding to concerns, each school will:

- Take all reports seriously, even where there is no physical evidence.
- Avoid victim-blaming and ensure children are supported appropriately.
- Consider the impact on the wider school environment.
- Involve external agencies where required.
- Consider whether racism, faith-based prejudice, faith-targeted abuse or other discriminatory factors are present and the impact these may have on the child's welfare and sense of safety.
- Record decisions, actions taken and rationale clearly.

All staff understand that even if there are no reports this does not mean abuse, harassment or violence is not happening, it is possible that abuse is unreported. Staff across the Trust challenge inappropriate behaviours between children that are abusive in nature.

Our school follows Part 5 of Keeping Children Safe in Education when responding to all concerns related to child-on-child sexual violence, sexual harassment and harmful sexual behaviours and recognises the need for clear reporting routes, consistent responses and ongoing support for all children involved, including alleged perpetrators, in line with a trauma-informed approach.

7. Supporting Children who are Questioning their Gender

EPA Trust and its schools recognise that children may question their gender identity. In line with statutory guidance, each school will take a cautious, considered approach, act in the best interests of the child and work in partnership with parents/carers.

Each EPA Trust school will not initiate a social transition. Any requests will be handled on a case-by-case basis, with advice sought as appropriate. Policies will not reinforce harmful gender stereotypes.

8. Online Safety and Filtering & Monitoring

EPA Trust and its schools recognise the need to ensure children are safeguarded from potentially harmful and inappropriate online material. Our school approach to online safety is to protect and educate children and staff in their use of technology and we have mechanisms to identify, intervene and escalate any concerns.

EPA Trust and its schools recognise the increasing safeguarding considerations associated with generative artificial intelligence (AI) and ensures that filtering & monitoring, staff training and pupil education reflects associated risks in line with Department for Education expectations.

EPA Trust and its schools understand that the breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate users for example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm, for example: making, sending and receiving explicit images, including consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI, e.g. deepfakes, sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group [APWG](#)

Filtering and Monitoring

EPA Trust and its schools recognise that filtering and monitoring systems are an important safeguarding measure but cannot prevent all online harm. Our children are supported through education, staff vigilance, safeguarding procedures and a whole-school approach to online safety.

Staff are aware of emerging online harms including AI-generated content, manipulated imagery, deepfakes, online coercion, online exploitation, harmful online communities, misogynistic content, extremist content and technology enabled abuse.

Our Governing Body are responsible for ensuring each school has appropriate filtering and monitoring systems in place and that there is review of their effectiveness at least once every academic year, with records maintained of those reviews.

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Trust Board and, where functions are delegated,

Local Governing Bodies also consider the age range of their pupils, those who are potentially at greater risk of harm and how often they access the IT system.

The appropriateness of any filtering and monitoring systems is informed by our Prevent risk assessment.

Additional guidance on filtering and monitoring is accessible through [Meeting digital and technology standards in schools and colleges - Filtering and monitoring: core standard - Guidance - GOV.UK](#)

9. Concerns and Allegations about staff, including supply staff, trainee teachers, volunteers and contractors

All staff understand the processes and procedures to manage any safeguarding concern or allegation (no matter how small) about staff members including supply staff, trainee teachers, volunteers and contractors).

If anyone has a safeguarding concern or an allegation is made about a member of staff, supply staff, trainee teacher, volunteer or contractor, it must be reported to the Headteacher without delay. Concerns about a Headteacher must be reported to the CEO. Concerns about the CEO must be reported to the Chair of Trustees. Where a concern may meet the harm threshold, advice will be sought from the Local Authority Designated Officer (LADO) in accordance with statutory guidance. The Trust's low-level concerns and allegations procedures must be followed.

If there is a concern or an allegation about a member of staff (including supply staff, trainee teachers, volunteers or contractors) that does not meet the harm threshold; this should be reported in accordance with the low-level concerns policy.

The harm threshold as defined in Working Together to Safeguard Children 2026 details the requirement to refer any concern or allegation about anyone working with children (whether paid or voluntary) who 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.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any concern or allegation that may meet the harm threshold must be referred to the Local Authority Designated Officer (LADO).

10. Information Sharing

EPA Trust and its schools recognise that all matters relating to safeguarding are confidential.

All staff members have a professional responsibility to share information with other agencies to safeguard children.

All staff will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.

Information sharing decisions will be timely, necessary and proportionate, taking account of the nature and level of risk to the child. Staff will not allow concerns about confidentiality or data protection to impact safeguarding action where a child may be at risk of abuse, neglect, exploitation or harm.

Staff across the Trust will not assume that another professional will share information or take action to safeguard a child. Where staff remain concerned that appropriate action has not been taken, they will continue to escalate concerns through the DSL and, where necessary, in accordance with the OSCP Escalation and Resolving Professional Concerns and Disagreement Policy.

11. Multi-Agency Working

EPA Trust and its schools recognise safeguarding as a shared, multi-agency responsibility and contributes actively, respectfully and constructively to joint decision-making, information sharing and coordinated plans to support children and families.

Each EPA Trust school will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

The DSL will participate in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Partnership. The DSL will consult with relevant staff and ensure clear processes for gathering the evidence required for reviews and audits and will embed recommendations into practice and complete required actions within agreed timescales.

Where disagreements arise between professionals or agencies, these will be managed respectfully and escalated in line with local safeguarding partnership procedures. EPA Trust and its schools recognise the importance of constructive challenge to ensure that children receive the right help at the right time.

12. Safer Recruitment –

to be read in conjunction with the Safer Recruitment policy

EPA Trust and its schools recognise that safeguarding responsibilities do not end once recruitment checks have been completed. Safeguarding vigilance, professional conduct, supervision, training,

low-level concern reporting, allegation management and ongoing suitability assessments form part of each school's safer culture.

All staff understand the requirement to disclose to the Headteacher any concern that may affect their suitability to work with children.

The Trust Board and, where functions are delegated, Local Governing Bodies will seek assurance that safeguarding considerations are embedded throughout the employee lifecycle, including recruitment, induction, supervision, development and departure from employment.

Our school is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with children and staff.

Our school maintains an accurate Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Trust Board and, where functions are delegated, Local Governing Bodies and each school's Leadership Team.

The Trust Board and, where functions are delegated, Local Governing Bodies will ensure that at least one person on every recruitment panel has completed safer recruitment training.

Our school is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2018 and related obligations under the Childcare Act 2006 in schools. (Applicable only to nursery, primary and childcare for children up to the age of 8)

Where each schools are also subject to the Early Years Foundation Stage Framework (EYFS), volunteers are not permitted to begin working within settings covered by the EYFS framework until each school has received the volunteer's enhanced DBS certificate including children's barred list information.

Each EPA Trust school will ensure that contractors and providers are aware of each school's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. Each EPA Trust school will require that employees and volunteers provided by these organisations use each school's procedures to report concerns.

We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with Keeping Children Safe in Education 2026. If assurance is not obtained, permission to work with our children or use each school premises may be refused.

Each EPA Trust school will ensure that appropriate safeguarding checks are undertaken for all volunteers in accordance with Keeping Children Safe in Education 2026. Where a volunteer is undertaking regulated activity, an enhanced DBS check including children's barred list information will be obtained as required. Each EPA Trust school will ensure that the nature, frequency and circumstances of volunteering activity are considered when determining the checks required and that these arrangements are reviewed where a volunteer's role changes.

When we commission services from other organisations, we will ensure that compliance with Trust and school policies and procedures is a contractual requirement.

13. Training

All staff, including those who do not work directly with children will read and understand Part One of Keeping Children Safe in Education 2026. Staff with responsibilities relevant to Part Five and Annex A will also read and understand those sections as appropriate to their role.

All staff who work directly with children will read, understand and adhere to Part One, Part Five and Annex A of Keeping Children Safe in Education. Our school does not rely on condensed safeguarding summaries as a substitute.

All staff in each school receive appropriate safeguarding training at induction, which is updated at least annually. All staff are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Safeguarding training promotes a culture of vigilance, professional curiosity and confidence to act. Staff are supported to understand how safeguarding concerns may present cumulatively and across different areas of a child's life.

Our Designated Safeguarding Lead (DSL) undergoes training to provide them with the knowledge and skills required to carry out their role; this training is refreshed every 2 years.

Deputy Designated Safeguarding Leads (DDSL) are trained to the same standard as the DSL and this training is refreshed every 2 years.

Safeguarding training is provided to all new staff on appointment as part of their induction process including each school's code of conduct, online safety which, amongst other things, includes an understanding of the expectations and applicable roles and responsibilities in relation to filtering and monitoring. This information will be regularly updated.

Each EPA Trust school will maintain accurate and up to date records of staff induction and training.

The Trust Board and, where functions are delegated, Local Governing Bodies will ensure that all Trustees and local governors receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to assure themselves that the safeguarding arrangements are effective and support a whole school approach to safeguarding. The training should be regularly updated.

Our school ensures that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles.

The DSL updates school staff and volunteers on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPRs) in line with Working Together 2026. These updates will include learning from local and national CSPRs, with a focus on what this means for each schools safeguarding practice.

The DSL will ensure that staff and volunteers are made aware of relevant changes introduced by Keeping Children Safe in Education 2026, including prejudice-based harm, racism and faith-based prejudice, the revised definition of sexual abuse, discriminatory behaviour including racism and faith-targeted abuse as child-on-child abuse, the expectation to promote an inclusive and anti-discriminatory whole-school culture and, where relevant to their role or setting, revised requirements relating to volunteers.

The DSL will use a variety of mechanisms to provide safeguarding updates to the school community including online safety.

14. Whistleblowing in a Safeguarding Context-

to be read in conjunction with the Whistleblowing policy

Whistleblowing is a term that is used when a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed. All staff and volunteers should feel able to raise concerns and know that they will be taken seriously by the Senior Leadership Team.

If staff identify poor or unsafe safeguarding practice, or potential failures in safeguarding provision, concerns should normally be raised with the Headteacher or school DSL. Concerns about a Headteacher should be raised with the CEO; concerns about the CEO should be raised with the Chair of Trustees. Staff may also use the Trust Whistleblowing Policy and external routes where appropriate.

If staff are concerned with the action or inaction through internal reporting procedures, then staff should refer to the Whistleblowing policy and may contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk

15. Site Security

All staff members have a responsibility to ensure our buildings and grounds are safe; this includes ensuring the safety of any visitors to each school.

Each EPA Trust school will not accept the behaviour of any individual, parent or anyone else, that threatens school security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to each school site.

EPA Trust and its schools recognise the risk of camera-enabled wearable devices including glasses and is alert to the privacy, safeguarding and data protection implications for each school community with procedural guidance detailed in acceptable use of IT, visitor arrangements and codes of conduct.

16. Quality Assurance

EPA Trust will maintain a Trust-wide safeguarding quality assurance framework to monitor the effectiveness and consistency of safeguarding arrangements across all schools. This will include scrutiny of decision-making, record keeping, training, safer recruitment, the Single Central Record, attendance-related safeguarding, filtering and monitoring, multi-agency working, allegations and low-level concerns, and the impact of actions taken to safeguard children. School-level assurance will feed into Trust-level oversight and reporting to the Trust Board.

School senior leaders, the Trust safeguarding lead, Local Governing Bodies and the Trust Board will ensure that any weaknesses or deficiencies identified in safeguarding arrangements are addressed without delay. Significant concerns, recurring themes and overdue actions will be escalated through the Trust's safeguarding assurance arrangements.

17. Policy Review

This Trust policy will be reviewed at least annually and sooner where statutory guidance, legislation, local safeguarding arrangements, learning from reviews or Trust quality assurance indicate that changes are required. The Trust Board will approve the policy. School Safeguarding Arrangements Appendices will be reviewed at least annually and whenever key personnel or local arrangements change.

The Trust safeguarding lead and school DSLs will ensure that staff, volunteers and relevant third parties are made aware of amendments to this policy and to local safeguarding arrangements. Each school will ensure that staff can readily access the current Trust policy and its School Safeguarding Arrangements Appendix.

Appendix 1: School Safeguarding Arrangements

Each EPA Trust school must complete and maintain this appendix. It forms part of the Trust Child Protection and Safeguarding Policy and should be reviewed at least annually and whenever local arrangements change.

School name: _____

Headteacher: _____

Designated Safeguarding Lead (DSL): _____

Deputy DSL(s): _____

Named Prevent lead: _____

Safeguarding link governor: _____

Safeguarding recording system and staff reporting route: _____

Arrangements for DSL cover, including trips, wraparound/extended provision and periods when the DSL is absent: _____

School-specific contextual safeguarding risks / local priorities: _____
Filtering and monitoring: named operational lead(s), review arrangements and escalation route: _____

Site-specific visitor, security and contractor arrangements: _____

Date appendix reviewed: _____ Next review: _____