

# Policy for Child Protection and Safeguarding



Reviewed by Jodie Cooper  
September 2026

### Commitment to review

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on yearly basis by a named person responsible below, who shall be accountable for that action. This policy will also be updated to reflect any statutory changes arising from future safeguarding legislation and statutory guidance.

|                                                                          |                                                                                         |                                                                                       |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Designated Safeguarding Lead<br>and Online Safety Lead                   | Jodie Cooper<br><a href="mailto:jodie.cooper@taw.org.uk">jodie.cooper@taw.org.uk</a>    |    |
| Designated teacher for looked-after and previously looked after children | Becky Brewer<br><a href="mailto:becky.brewer@taw.org.uk">becky.brewer@taw.org.uk</a>    |  |
| Early Help Lead                                                          | Margo Richens<br><a href="mailto:margo.richens@taw.org.uk">margo.richens@taw.org.uk</a> |  |
| Deputy Designated Safeguarding Lead                                      | Becky Brewer                                                                            |  |

|                                     |                                                                                |                                                                                     |
|-------------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Deputy Designated Safeguarding Lead | Vicky Lees<br><a href="mailto:vicky.lees@taw.org.uk">vicky.lees@taw.org.uk</a> |  |
| Safeguarding Governor               | Katie Handy                                                                    |                                                                                     |
| Prevent Governor                    | Katie Handy                                                                    | Photograph                                                                          |
| Academy Trust Safeguarding Lead     | Mark Davies                                                                    | Photograph                                                                          |

# Flourishing Together Releasing Potential Inspiring Futures

## St. Bart's Mission

We ensure that every academy is a flourishing community, dedicated to releasing potential and inspiring ambitious futures through exceptional education.

## St. Bart's Vision and Values

Releasing potential together through **PEACE**:



### PASSION

We pursue excellence with energy and purpose, releasing the potential within every child and adult.



### ENCOURAGEMENT

We nurture confidence and resilience, supporting each individual so that they can thrive.



### AMBITION

We set high expectations, striving for fairness and opportunity so that potential is not limited by circumstance.



### COLLABORATION

We work together in partnership, recognising that flourishing comes when we share strengths and support one another.



### ENJOYMENT

We celebrate learning and community life, creating joy-filled environments where potential can flourish.



Our Trust Christian ethos is captured by the **PEACE** values and all of our academies work in close partnership (*whether C of E or community*) to ensure that all children, adults and the communities they serve flourish just as Jesus encouraged us to do in John 10:10 - ***"I have come that they may have life, and have it to the full."***

St. Bart's vision includes a strong commitment to preparing our children for a world impacted by climate change, through learning and practical experience. We encourage pupils and staff to consider the impact of their actions locally and globally, while embedding climate change education across our curriculum, and sustainability into our ethos and Trust-wide practice.

## 1. Aims

The academy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2026) and Working Together to Safeguard Children (2026), and the Maintained schools: governance guide. We comply with this guidance and the arrangements agreed and published by our 3 local **safeguarding partners**.

This policy is also based on the following legislation:

- Part 3 of the schedule to The Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation). This means our governors and Head of School should carefully consider how they are supporting their pupils

with regard to these characteristics. The Act allows our academy to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination.
- Operation Encompass statutory guidance, which explains that the police must notify our academy of any incidents involving domestic abuse
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets the requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy also complies with our funding agreement and Articles of Association.

This policy is to be read in conjunction with the LA local procedures and threshold documents.

### 3. Terminology and Acronyms

|                              |                                                                                                                                                                                                                                                                                                                        |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Child or young person</b> | Anyone who has not yet reached their 18th birthday                                                                                                                                                                                                                                                                     |
| <b>Staff</b>                 | Birth parents or adoptive parents i.e. those with parental responsibility. It is recognised, however, that other adults may be in a parenting role, for example step parents and foster carers.                                                                                                                        |
| <b>Abuse</b>                 | A form of maltreatment which includes physical, sexual and emotional harm or neglect. A person may abuse a child by inflicting harm or by failing to act to prevent harm. Children may be abused within their family, in an institutional or community setting, by those known to them, or, more rarely by a stranger. |

|                                           |                                                                                                                                                                                                      |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Family Help</b>                        | Providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.                                                                          |
| <b>Initial Family Help Assessment</b>     | A means of providing families with the help and support they need to prevent issues from escalating (and avoid involvement from Children's Social Care.)                                             |
| <b>Family Help Assessment (FHA)</b>       | A way of identifying the strengths and needs within a family in order to provide the right help and support at the right time.                                                                       |
| <b>Safeguarding</b>                       | The action we take to promote the welfare of all children and prevent them from coming to any harm.                                                                                                  |
| <b>Child Protection</b>                   | The activity undertaken to protect specific children who are identified as suffering, or likely to suffer significant harm. Child protection is one element of safeguarding.                         |
| <b>Child Safeguarding Practice Review</b> | When a child dies or is seriously injured through abuse or neglect Local Safeguarding Children Partnerships/Boards are required to consider a CSPP. This must be rapid and completed within 15 days. |
| <b>Harm</b>                               | The ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.                                                        |
| <b>DSL</b>                                | Designated Safeguarding Lead                                                                                                                                                                         |
| <b>LADO</b>                               | Local Authority Designated Officer                                                                                                                                                                   |
| <b>CIN / CIN Plan</b>                     | Child in Need / Child in Need Plan (under S.17 Children Act 1989)                                                                                                                                    |
| <b>CP / CP Plan</b>                       | Child Protection / Child Protection Plan (under s.47 Children Act 1989)                                                                                                                              |

|             |                               |
|-------------|-------------------------------|
| <b>LAC</b>  | Looked After Child            |
| <b>PLAC</b> | Previously Looked After Child |
| <b>CCE</b>  | Child Criminal Exploitation   |
| <b>CSE</b>  | Child Sexual Exploitation     |
| <b>EHE</b>  | Elective Home Education       |
| <b>FGM</b>  | Female Genital Mutilation     |
| <b>MASH</b> | Multi Agency Safeguarding Hub |

This policy and the accompanying procedures have been developed in accordance with the following legislation, statutory guidance and local safeguarding procedures:

**Section 175 of the Education Act 2002** places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the academy are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the academy.

**Section 157** of the same Act places the same duty on non-maintained and independent schools, including free schools and academies.

**Section 17 of the Children Act 1989** applies to children who have highly complex needs (for example a child with a disability;) or a child who may be experiencing compromised parenting and require Children's Social Care involvement to ensure their needs are met through a Child in Need Plan.

**Section 47 of the Children Act 1989** applies to children who are suffering or likely to suffer significant harm and require Children's Social Care involvement in order to ensure that they are protected from harm. A Child Protection plan is required which will be coordinated by a social worker. Local authorities have a duty to make enquiries under Section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, to enable them to decide whether they should take any action to safeguard and promote the child's welfare. There may be a need for immediate protection whilst the assessment is carried out.

**Section 10 of the Children Act 2004** requires all maintained schools, further education colleges and independent schools, including free schools and academies, to cooperate with the local authority to improve the well-being of children in the local authority area.

#### 4. Definitions

**Safeguarding and promoting the welfare of children means:**

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing 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 this definition and refers to activities 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 online.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is 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. The appendices defines neglect in more detail.

**Making or sharing of nudes or semi-nudes** is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

#### 4. Equality Statement

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

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an Additional Language (EAL)
- Are known to be living in difficult situations - for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of Female Genital Mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## 5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the academy and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended academy and off-site activities.

The academy plays a crucial role in preventative education. This is in the context of a whole-academy approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Boundaries and consent
  - Healthy and respectful relationships
  - 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
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 5.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance

- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

**All staff will be aware of:**

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the Designated Safeguarding Lead (DSL) and deputy DSL(s), the Behaviour Policy, Online Safety Policy and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the academy's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
  - 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
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at academy and online

- The fact that mental health can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

## 5.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Jodie Cooper. The DSL takes lead responsibility for child protection and wider safeguarding in the academy. This includes online safety and understanding our filtering and monitoring processes on academy devices and academy networks to keep pupils safe online.

During term time, the DSL will be available during academy hours for staff to discuss any safeguarding concerns.

Please email: [Jodie.cooper@taw.org.uk](mailto:Jodie.cooper@taw.org.uk) out of hours.

When the DSL is absent, the Margo Richens, Becky Brewer and Vicky Lees will act as cover.

If the DSL and [deputy/deputies] are not available or absent, we have cover arrangements in place. This includes:

- Ring Family Connect: 01952 387927

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our academy
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the Head of School informed of any issues
- Liaise with Local Authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the academy's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the academy, ensure their child protection file is transferred to the new academy

The full responsibilities of the DSL and [deputy/deputies] are set out in their job description.

### 5.3 The Local Governing Committee (LGC)

The LGC will:

- Facilitate a whole-academy approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all staff who work directly with children read **at least part 1** of Keeping Safe in Education (KCSIE) and those who staff who do not work directly with children read **part 1** of KCSIE
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head of School to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our academy's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the LGC. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the academy has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the academy has appropriate cyber security systems in place

- Ensure that the academy has appropriate filtering and monitoring systems in place and review their effectiveness at least once every academic year. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Ensuring that reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the academy in meeting these standards
- **Make sure:**
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-academy approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the academy roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the academy about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' if an allegation of abuse is made against the Head of School, where appropriate.

All LGC members will read Keeping Children Safe in Education (KCSIE) in its entirety.

Section 19.3 of this policy has information on how LGC members are supported to fulfil their role.

## 5.4 The Head of School

The Head of School is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems that support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the academy and via the academy website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

## 5.5 Virtual School Heads

Virtual School Heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, Special Educational Needs Co-ordinators (SENCOs), social workers, mental health leads and others.

## 6. Voice of the Child

To safeguard and promote the welfare of children, it is essential that our staff gain a clear picture of a child's wishes, thoughts and feelings. Understanding the child's lived experience will be achieved through listening to what children say, observing their non-verbal cues (particularly for pre-verbal and non-verbal children) and observing their interaction with family members and peers is key to our academy's practice. A child's voice will be captured on CPOMS as the impact of direct work, a referral reason or as part of our lateral checks. Direct work is used to gather pupil voice and ensure that a pupil can raise their concerns and feel safe and supported.

- The right of a child or young person to be heard is included in the UN Convention of Rights
- The Children's Act 2004 emphasises the importance of speaking to the child or young person as part of any assessment
- The importance of speaking to a child or young person and gathering their views has been consistently highlighted in lessons learned from local child safeguarding practice reviews.

### 6.1 Multi Agency Working:

Multi-agency working is when professionals from different organisations or services work with us to support a child or family and achieve the best possible outcomes. This may involve services such as social care, health professionals, the police and voluntary organisations sharing relevant information, communicating effectively and coordinating their support. Effective multi-agency working ensures that everyone understands their role and responsibilities, reduces the risk of important information being missed, and helps provide a more consistent and holistic approach to meeting a person's needs. It is particularly important when an individual may be vulnerable or require support from several different services.

By implementing effective multi-agency working we aim to:

- keep children safe from harm,
- improve wellbeing and development,
- provide consistent support for families,
- and ensure timely intervention when concerns arise.

By working with different professionals and organisations, we collaborate to protect and promote the welfare of children. This includes the following services:

Family Connect, Social Services, Early Help, Family Hubs.

## 7. Confidentiality

- Timely information-sharing is essential to effective safeguarding
- Arrangements should be in place setting out the processes and principles for sharing information within the academy and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018, Data (Use and Access) Act 2025, and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to

share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the academy not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information (including personal information), and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Where a child leaves the academy, the DSL should ensure their child protection file is transferred to the new academy or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should also consider if it would be appropriate to share any information with the new academy or college in advance of a child leaving.

## 8. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs
- Has special educational needs (whether they have a statutory Education Health and Care (EHC) 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 bereaved
- Is showing early signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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 drugs or alcohol
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

### 8.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to Local Authority children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

1. Record the concern or disclosure on our CPOMs reporting system.
2. In the unlikely event that a DSL is not available, contact IFD on 02782 235100.

Refer to Family Connect 01952 387927 or [educationtriage@telford.gov.uk](mailto:educationtriage@telford.gov.uk)

to report child abuse to the local authority.

### 8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Write up the disclosure on CPOPMS reporting system, however, do not rely solely on this- ensure that you have informed a DSL.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful

- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

### 8.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- **Must** immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve Local Authority children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** (where relevant) appears to have been a victim of FGM, should speak to the DSL and follow our local safeguarding procedures.

### 8.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

If you have concerns about a child, where possible, please speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.

### **Early Help Assessment**

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the academy will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Contact Margo Richens to organise an EHA.

### **Referral**

If it is appropriate to refer the case to Local Authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The Local Authority should decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Please contact Family Connect - 01952 387927

### **8.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which academy staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

## **7.6 If you have a concern about mental health**

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.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise, including:

- Significant changes in behaviour,
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4. If you feel that a child is in danger, call

999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Further information can be found on the Department for Education website on [mental health and behaviour in schools](#) or by reading our Mental Health Policy.

### **8.6 Concerns about a staff member, supply teacher, volunteer or contractor**

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head of School as soon as possible. If the concerns/allegations are about the Head of School, speak to the chair of governors.

The Head of School / chair of governors will then follow the procedures set out in appendix 3, if appropriate.

All academies:

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Head of School, report it directly to the Local Authority Designated Officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the academy premises for running an activity for children, follow our academy safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the academy will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

### **8.7 Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "part of growing up", or "boys being boys", as this can lead to a culture of unacceptable behaviours, misogyny/misandry and an unsafe environment for pupils.

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.

Most cases of pupils hurting other pupils will be dealt with under our academy's relational behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the academy at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the making or sharing of nudes and semi-nudes, including where generated by AI), which may include or be driven by misogyny/misandry

### **Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering academy transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Any concerns are recorded on CPOMS, and a DSL will then contact Family Connect for LADO screening.

### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting, making or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems.
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Recognise the intersection of misogyny/misandry and harmful sexual behaviour. We will actively identify, challenge and address how misogynistic/misandrist attitudes contribute to the normalisation of inappropriate behaviour and increases the risk of leading to child-on-child abuse, including sexual harassment and sexual violence, within our academy environment
- Be alert to the prevalence of harmful online material and extreme misogynistic/misandrist ideologies, including misogynistic influencers, and recognise the impact this content could have on shaping pupils' attitudes
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in academy, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child's behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- That exposure to misogynistic/misandrist content online can indicate a safeguarding concern and requires early discussion with the DSL

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, such as by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our academy from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or Local Authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

## 8.8 Making or sharing of nudes and semi-nudes

### Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate academy staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another academy, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Head of School and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the DSL Team.

### **Recording incidents**

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 18 of this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the making or sharing of nudes and semi-nudes as part of our relationships, sex, health and education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment. This also includes making such images, including where generated by AI
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to make, provide (or forward) such images
- The receipt of such images

This policy on the making or sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the academy will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child

- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

### **8.10 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's voice, wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Effective, pupil friendly posters displayed around the academy detailing how they can make disclosures.
- Regular safeguarding visitors, such as the NSPCC etc, encouraging children to make reports.

### **8.9 Online safety and the use of mobile technology**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our academy aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole academy community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole academy community, including the expectation that our academy is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- **Content** - being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** - being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as 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, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to academy for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in academy, use of the academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the academy's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our academy community
- Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by [insert member of SLT responsible for filtering and monitoring] with the support of our DSL and IT support
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our academy's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website

## **Mobile Phones**

### **9. Filtering and Monitoring**

The academy staff receive induction training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. The designated safeguarding lead takes lead responsibility for understanding and monitoring the filtering and monitoring systems and processes in place.

The filtering and monitoring system used in our academy is Light Speed filter. Light Speed helps our teachers safely manage classrooms and the use of iPads. With real-time visibility of student activity and control over their device workspaces to limit distractions, teachers have more time to support student learning. The system pushes out vetted URLs to all pupils, closes distracting tabs, and blocks inappropriate websites. The system is monitored by the DSL and the safeguarding team.

The academy uses our MAT audit to self-assessment to evaluate our provision against the standards, and receive personalised recommendations on how to meet them:

[Plan technology for your school - GOV.UK](#)

[It is the LGCs' duty to review the filtering standards and discuss requirements with the IT providers.](#)

## **9.1 Cyber Security**

Safeguarding, in the context of cyber security, refers to the measures that the academy takes to protect our children from harm online. This includes protecting them from cyberbullying, online grooming, exposure to harmful content, and other online risks.

Filtering and monitoring standards for academies and colleges

As part of online safety, we are aware of our responsibility for information security and access management, and we will ensure that we have the appropriate level of security protection procedures in place in order to safeguard our systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Guidance documents:

[Meeting digital and technology standards in schools and colleges - Filtering and monitoring - core standard - Guidance - GOV.UK](#)

Cyber Security:

[Cyber security training for school staff - NCSC.GOV.UK](#)

## **10. EYFS Safeguarding Arrangements**

### **Safer Recruitment**

Kingsland CE Academy ensures that potential applicants are given the right messages about the academy's commitment to recruit suitable people. The academy adheres to the MAT Recruitment and Vetting Policy.

We adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges.

The Governing body ensures that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We ensure that at least one of the persons who conducts an interview has completed safer recruitment training. The governing body chooses appropriate training and may take advice from the Trust and LA safeguarding procedures.

Where a post is advertised, we include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

We provide a copy of the academy's safeguarding and child protection policy and practices and policy on employment of ex-offenders in the application pack or refer to a link on our website.

We require applicants to provide:

- personal details, current and former names, current address and national insurance number
- details of their present (or last) employment and reason for leaving
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- qualifications, the awarding body and date of award
- details of referees/references (see below for further information), and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

We only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

When someone has worked abroad the following checks will be carried out:

- An enhanced DBS check

- A Prohibition check
- Criminal record check
- 2 references will be gathered, one of which will be from the trainee's most recent employment. References will be obtained directly from the referee, who should be a senior person with appropriate authority.
- Online searches will be carried out
- A request of employment history
- A letter from the organisation that regulates teachers in the country where the applicant qualified will be obtained.

### **Shortlisting**

Shortlisted candidates are asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records; further information can be found on [GOV.UK](https://www.gov.uk)

For example:

- if they have a criminal history
- if they are included on the children's barred list
- If they are prohibited from teaching
- information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
- if they are known to the police and children's local authority social care

- if they have been disqualified from providing childcare
- any relevant overseas information.
- if they are prohibited from taking part in the management of an independent school
- If they are prohibited from teaching.

This information is only requested from applicants who have been shortlisted.

Applicants are asked to sign a self-declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate physically signs a hard copy of the application at the point of interview.

The academy makes online searches as part of pre-recruitment checks.

## References

Our academies obtain two references before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview:

- We do not accept open references
- References that are from the candidate's current employer, training provider or education setting
- References that have been completed by a senior person with appropriate authority
- **We do not accept** references that have been provided by an applicant's family member
- We ensure that the most recent relevant employment history has been verified
- If applicable, a reference from the applicant's most recent work setting involving children has been obtained
- Electronic references must be confirmed to be from a legitimate source
- Referees have been contacted to clarify information if it's deemed vague or insufficient
- Information on the application form and reference match, and any discrepancies have been clarified by candidate
- The reason for leaving their current or most recent post has been established

Any concerns must be resolved satisfactorily before appointment has been confirmed

Individuals who have not undergone suitability checks are not allowed unsupervised contact with children

Ofsted will be informed of any significant event (including disqualification), which is likely to affect the suitability of any person who is in regular contact with children on the premises

### **Administering Medications**

Medicines are administered and recorded in line with the DFE Supporting Pupils with Medical Conditions (Dec 2015) and SBMAT Medicines Policy.

#### Supporting pupils with medical conditions at school - GOV.UK

A policy and procedure for administering medicines, including systems for obtaining and updating information about medical needs, are in place.

Prescription medicines are not administered unless they have been prescribed for a child by a doctor, dentist, nurse or pharmacist.

Medicines (both prescription and non-prescription) are only administered where written permission is obtained from a child's parent or carer to administer that medicine.

### **Mobile Phones**

- Mobile phones can only be used on a designated break, and this must be away from the children.
- Mobile phones should be always stored safely in a designated area during working hours.
- Photographs must not be taken of the children on any personal phones or any other personal information storage device. Only nursery-owned Ipads can be used to take photographs or videos.
- All members of staff should remain vigilant and report any concerns to the designated safeguarding lead (DSL). Parents and staff should be informed of the complaints procedure and staff made aware of the whistleblowing procedure.
- If a member of staff breaches the mobile phone policy, action will be taken in line with the staff code of conduct and managing allegations section of this policy.
- If a member of staff is thought to have illegal content on a mobile phone or have committed a criminal offence using a personal device or mobile phone, the police will be contacted, and the LADO (Local Authority Designated Officer) will be informed.

## **Safer Eating**

Before a child is admitted to our setting, information about special dietary requirements, preferences, food allergies and special health requirements has been obtained. This has been shared with all staff involved in food preparation and handling and eating supervision.

Allergy care plans are created with health professionals to manage known allergies/intolerances.

While eating our EYFS children will be:

- Within sight and hearing of a staff member
- In the same room as a staff member with a valid PFA certificate
- Seated, in appropriately low seating or a highchair where possible
- In an area of minimal distractions, where possible
- Facing staff, so staff can prevent choking, food sharing and be aware of accidental allergic reactions

### **11. Confidentiality, Consent and Information Sharing:**

- We recognise that all matters relating to child protection are confidential.
- The Head of School or DSL will disclose any information about a pupil to other members of staff on a need-to-know basis only.
- Staff members cannot promise a pupil to keep 'secrets' which might compromise their safety or well-being, or the safety and well-being of others.
- All staff members have a professional responsibility to share information with other agencies to safeguard children, and the Data Protection Act is not a barrier to this.
- All our staff members who come into contact with pupils will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.
- We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information

### **12. Artificial intelligence (AI)**

Generative Artificial Intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Priorslee Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Priorslee Academy will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the academy. Our academy's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE).

### 13. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

### 14. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be

abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in academy or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils. This includes:

- Supporting communication aids and strategies.
- Use of communications boards and widgets
- Strong key worker and pupil relationships to ensure that the pupils can communicate effectively.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. The academy considers extra pastoral support and attention for these children and ensure any appropriate support for communication is in place.

#### 15. Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the academy, or the child may be repeatedly sent to academy without essential medication, putting them at risk.

#### 16. Young carers

The academy recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers

receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service

#### 17. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

#### 18. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Becky Brewer who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

## 19. Pupils who are lesbian, gay or bisexual

The academy recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm. However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. See our Behaviour Policy for more detail on how we prevent bullying based on sexuality.

Any concerns should be reported to the DSL.

## 20. Pupils who are questioning their gender

### 20.1 Supporting pupils who are questioning their gender

We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our Behaviour Policy for more detail. The academy will ensure that children and their families are aware that, while the academy will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

The DSL will lead in these cases.

### 20.2 Involving parents/carers in cases of pupils questioning their gender

Where a child who is questioning their gender asks for support from the academy, we will engage parents/carers as a matter of priority.

However, in the rare circumstances where involving parents/carers might put a pupil at greater risk than not involving them, the DSL will determine a course of action needed to safeguard the child before contacting parents/carers or any decisions are taken.

Where a child confides in a member of staff about their feelings but does not ask the academy to make changes to how they are treated, the academy will only break any confidence if there is a related safeguarding risk.

### 20.3 Considering requests for support with social transition

The academy will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the academy makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the academy and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the academy will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the academy's evaluation of the welfare and best interests of the child and other children. The academy will make decisions in line with the following principles:

- The academy has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes
- Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the academy parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered
- Accommodating social transition is an active intervention so the academy will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes
- The academy will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The academy will ensure that the decision-making process is documented, and records are kept.

The circumstances or needs of a child may change over time, and the academy may need to review its original decision and will involve the DSL in doing so.

### 20.4 Rules on single-sex spaces

Children are not allowed into toilets, changing rooms, showers or designated for the opposite biological sex, with no exceptions.

### 20.5 Rules on single-sex sports

The academy may teach and play some sports or games, or activities of a competitive nature, in single-sex groups where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The academy can separate children according to their biological sex in these circumstances.

Some sports may need to be played in single-sex groups from a certain age to ensure children's safety. Where single-sex sports are implemented for safety reasons, there are no exceptions and pupils must not be allowed to participate in sports designed for the opposite sex.

## 20.6 Complaints and concerns about academy safeguarding policies

### Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

### Other complaints

Complaints regarding safeguarding procedures, pupil welfare, or academy premises should be raised in accordance with the academy's main **Complaints Policy**. Please ensure that you raise your complaint with the DSL initially.

## Confidential Reporting and Whistleblowing

If staff, volunteers, or visitors have concerns regarding the way the academy safeguards pupils - including poor or unsafe practice, potential failures in the safeguarding regime, or concerns about the culture of safeguarding - please refer to the academy's separate Confidential Reporting policy.

## 21. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive chronology of the concern
- Details of how the concern was followed up and resolved

- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be uploaded on to our CPOMS reporting system.

Safeguarding records relating to individual children will be retained for a reasonable period after they have left the academy and stored on our CPOMS system under 'archived records'.

If a child for whom the academy has, or has had, safeguarding concerns moves to another academy, the DSL will ensure that their CPOMS records are transferred as soon as possible.

To allow the new academy to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving academy and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Any information requested by other agencies these will be transferred using the secure mail systems provided by the local authority. Where this facility is not use by the receiving agency, password protected documents will be transferred via email or hand delivered with a receipt of transfer requested.

## 22. Training

### 22.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures and online safety, to ensure they understand the academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-academy safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

## **22.2 The DSL and Deputy DSL(s)**

The DSL and Deputy DSL(s) will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

## **22.3 Governors**

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the academy to deliver a robust whole-academy approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head of School, they receive training in managing allegations for this purpose.

## **24.4 Recruitment – interview panels**

At least 1 person conducting any interview for any post at the academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

## **25.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervision, which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Within our Early Years provision, leadership and supervision meet the requirements of the EYFS statutory framework: the lead teacher in charge holds an approved qualification at Level 3 or above, and at least half of all other supporting staff hold an approved Level 2 qualification or higher. Children are adequately supervised at all times - particularly during eating - and staffing deployments are managed flexibly to ensure every child's individual learning and welfare needs are met. Children are normally kept within both the sight and hearing of staff, and are at all times within sight or hearing, and we inform parents and carers about how our staffing and classes are organised

## **26. Mobile Phones**

The children's mobile phones are stored at the academy office when pupils arrive and collected at the end of the school day. Children do not use their phones at any point during the school day. Mobile phones are not used for learning.

## **27. Medical Safeguarding**

### **27.1 Emergency EpiPens**

We have access to emergency EpiPens as allergies are more common, anaphylaxis can happen. With access to these we can provide immediate emergency treatment as we wait for the emergency services to arrive. We have a responsibility to safeguard and protect our children. We have children and staff who have their own prescribed EpiPens, these must be used first in an emergency.

### **27.2 Bleed Control Kits**

As it is recommended, when there are 200 or more children in a public establishment, there should be access to the bleed control kit. We have access to a bleed control kit. This is there just in case it is needed to protect life. We have a duty of care to protect our children and staff. Having this resource in place ensures that we meet health and safety standards and reduce risk.

## **28. Kinship Care**

We will liaise with the Virtual School for advice, information, and support for kinship carers (including Special Guardians and Child Arrangement Orders). The virtual school will provide advocacy for pupils.

## **29. Serious Incident**

A Serious child safeguarding incident is one where a child has died or been seriously harmed and abuse or neglect is known or suspected. When such incidents occur, safeguarding partners must act quickly to notify the Child Safeguarding Practice Review Panel within five working days and work together to review the case. These processes—notification, rapid review, and, where appropriate, a local child safeguarding practice review—are designed to identify learning, improve multi-agency practice, and strengthen how organisations work together to protect children. We will take an active role in this process.

## **30. Family Help Procedures**

The academy has a trained Family Help Lead- Emma Street

"Family Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse."

Our team is aware that Family Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

Any child may benefit from Family Help, but ALL academy/college staff are particularly alert to the potential need for Family Help for a child who: -

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a Young Carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from academy, care or from home.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending

- is in a family circumstance presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues and domestic abuse.
- is misusing alcohol or other drugs themselves.
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

The DSL ensures that all staff are aware of the Family Help process and understands their role in it. This includes identifying emerging problems, liaising with the DSL/ DDSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking a Family Help assessment.

Concerns about a child should always lead to help for a child. The academy may need to escalate its concerns with Children's Services to ensure a referral is accepted or work with other agencies to ensure that a Family Help Assessment is completed.

Family Help and early intervention are forms of support aimed at improving outcomes for children or preventing escalating need or risk. Because of this, they are also sometimes referred to as prevention or preventative services.

These services are part of a "continuum of support" that the academy offers. We provide help to families who do not, or no longer, meet the threshold for a statutory intervention.

Staff are alert to the potential need for Family Help for pupils who have "experienced multiple suspensions, [are] at risk of being permanently excluded from the academy.

The academy is aware that Family Help procedures strengthen the role of education and childcare settings in supporting children and keeping them safe, including information on a child's right to education and risk factors for practitioners to consider when identifying children and families who may benefit from early help.

Our staff are aware of the potential need for a Family Help for pupils who have experienced multiple suspensions, are at risk of being permanently excluded and are placed in Alternative Provision.

The Family Help Champion and DSL ensures that all staff are aware of the early help process and understands their role in it. This includes identifying emerging problems, liaising with the DSL/ DDSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking a Family Help assessment.

Guidance documents can be accessed at the following links:

### **Family Help Model**

Family Help key approach designed to ensure that our children and families receive the right support at the earliest opportunity. It is based on the principle that families should not have to wait for help and that support should respond flexibly to their needs. Family Help brings together early help services and statutory support (such as Section 17 child in need services) into a single, coordinated system, delivered by multi-agency teams working together within local communities. By using this approach, we focus on building consistent relationships with families, understanding their individual circumstances, and providing timely, joined-up support to improve outcomes for children and prevent issues from escalating.

### **31. Restrictive Intervention including the use of reasonable force**

Please read in conjunction with the DfE guidance:

**<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>**

There are circumstances when it is appropriate for staff in academy to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's

path, or active physical contact such as leading a child by the arm out of the classroom.

Departmental advice for academy's is available in Use of reasonable force in schools

When using reasonable force in response to risks presented by incidents involving children including any with SEND or disabilities, or with medical conditions, staff should consider the risks carefully.

By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force.

Currently the academy follows the following DfE guidance, as of April 1st 2026, the academy will follow the new legislation and the MAT Restrictive Intervention Policy

### **32. Examples of Specific**

A specific safeguarding issue is any risk, situation, or behaviour that threatens an individual's health, well-being, or human rights, putting them at risk of abuse, neglect, or exploitation. In professional and legal contexts, safeguarding is divided into "general categories of abuse" and "specific safeguarding issues"—the latter referring to complex, contextual, or emerging forms of harm that often require specialised statutory interventions

#### **Mental Health**

All staff have an important role to play in supporting the mental health and wellbeing of our pupils and are aware that 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. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

The academy engages with the following agencies to support our pupil mental health:

- CAMHS

- The Nursing Service

We have trained mental health first aider - Becky Brewer.

We also implement and utilise our Mental Health Triage document to identify and guide support mechanisms for pupils.

Guidance and helpful documents: -

[Addressing trauma and adversity | Resources | YoungMinds](#)

[Mental health and behaviour in schools - GOV.UK](#)

[Preventing and tackling bullying - GOV.UK](#)

[Webinar for schools and further education providers: Every interaction matters WITH AUDIO](#)

[Parenting and mental health](#)

[Mental health and parenting | NSPCC](#)

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and by speaking one of the academy DSLs

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day- to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic

Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

### 33. Links with other policies

This policy links to the following policies and procedures:

- Staff Code of Conduct

- Complaints Procedure
- Health and safety
- Attendance
- Online safety
- AI
- Mobile Phone
- Equality
- Relationships and Sex Education
- First Aid
- Curriculum
- Privacy notices
- Confidential Reporting and Whistleblowing
- Anti-Bullying

#### 34. Monitoring arrangements

This policy will be reviewed **annually** by the DSL. It will also be reviewed and updated in accordance with statutory legislation changes.

At every review, it will be approved by the Local Governing Committee.

#### Appendix 1: Types of Abuse

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

**Physical abuse** 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** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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 participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

**Sexual abuse** involves forcing 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
- 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.

**Neglect** is 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 because 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Appendix 2: Specific Safeguarding Issues**

### **County Lines**

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. Important areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes because of this trend.

### **Cuckooing**

Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation. People who choose to exploit will often target the most vulnerable in society. They establish a relationship with the vulnerable person to access their home.

The most common form of cuckooing is where drug dealers take over a person's home and use it to store or distribute drugs but there are different types of cuckooing:

- Using the property to deal, store or take drugs
- Using the property to sex work
- Taking over the property as a place for them to live
- Taking over the property to financially abuse the tenant

Academy staff to be aware of 'cuckooing' as this may be happening in a property where one or more of our children are residing.

## **Hate Crimes:**

Hate crimes are crimes that are motivated by prejudice of some kind. These are crimes where the victim is targeted because they are a member of a particular social group or have a particular characteristic, which the perpetrator has negative views or beliefs about. The legal definition is:

"Any crime which is understood by the victim or any other person as being motivated (wholly or partly) by malice or ill will towards a social group."

## **Modern Slavery**

Modern Slavery is a term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude or Compulsory Labour and Human Trafficking. These crimes include holding a person or persons in a position of slavery, servitude, forced or compulsory labour or facilitating their travel with the intention of exploiting them soon after. Although human trafficking commonly involves an international cross-border element it is also possible to be a victim of slavery or trafficking within your own country. Furthermore, it is also possible to be a victim even if consent has been given to be moved or travel.

Regarding children, it is important to note that they cannot give consent to being exploited and as such, the element of coercion or deception does not necessarily need to be present to prove an offence.

## **Sexual Exploitation:**

Sexual Exploitation is a type of sexual abuse. When a child is at risk of being exploited, they're given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities. Children are often tricked into believing they're in a loving and consensual relationship. This is called grooming. They may trust their abuser and not understand that they're being abused.

Children can be trafficked into or within the UK to be sexually exploited. They're moved around the country and abused by being forced to take part in sexual activities, often with more than one person. Children, young people and adults at risk in gangs can also be sexually exploited.

## **Fabricated or Induced Illness (FII)**

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child.

Guidance documents:

[Safeguarding children in whom Illness is fabricated or induced guidance](#)

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity. Indicators of risk include household debt, rent arrears, domestic abuse, and anti- social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will not replace a referral into children's social care where a child has been harmed or is at risk of harm. Children's services will be the lead agency for these young people and the DSL will ensure that appropriate referrals are made based on the child's circumstances.

Further explanation is found at Homeless Reduction Act Factsheets Homeless reduction factsheet

[Homelessness Reduction Act: policy factsheets - GOV.UK](#)

## **Children who identify as or are perceived as are Lesbian, Gay, Bi or Trans (LGBT+)**

We know the fact that a child or a young person may be LGBT+ is not in itself an inherent risk factor for harm. However, we know that children who are LGBT+ can be targeted by other

children. In some cases, a child who is perceived by other children to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+.

. We are aware that risks can be compounded where children who are LGBT+ lack a trusted adult with whom they can be open. We therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. LGBT+ inclusion is part of the statutory Relationship, Sex Education and Health Education curriculum and a range of support is available to us to help counter homophobic, biphobic and transphobic bullying and abuse as below.

### **Assessing adult-involved nude and semi-nude sharing incidents**

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

### **Sexually motivated incidents**

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person

- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

### **Financially motivated incidents**

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes

- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

### **Children who are absent from education**

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a academy
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the academy without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

In EYFS, if a pupil is absent for a prolonged period, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Staff are trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial

advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. Victims are not always recognised and can be criminalised for actions they take while under coercion.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child-on-child abuse (including harassment and violence)**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of academy. It can also take place both face-to-face and online and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable, and it may involve serious physical harm or threats involving weapons.

Our academy has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI
- Upskirting, which is a criminal offence, 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
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

Police must notify a academy of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in academy (usually the designated safeguarding lead) before the child or children arrive at academy the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for [information sharing](#).

The DSL will provide support according to the child's needs and update records about their circumstances.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmv@fco.gov.uk](mailto:fmv@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our academy from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and the [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the academy's measures to prevent radicalisation are set out in other academy policies and procedures.

### **Harmful sexual behaviour, sexual violence and sexual harassment between children in schools**

The academy will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the academy premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same academy.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the academy that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our academy's approach to this type of abuse.

### **Serious violence**

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups

- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the academy who are visiting for a professional purpose, such as educational psychologists and academy improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the academy any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using academy facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

#### **Non-collection of children**

If a child is not collected at the end of the session/day, we will contact all contact on the list supplied by parents and carers. Your child will then be placed in after school club and continued attempts will be made to contact all contacts on the list provided.

