Document Title	**Child Protection and Safeguarding Policy (Horbury Academy)**
Author/Owner (Name and Title)	Strategic Director of Safeguarding
Version Number	V1
Date Approved	27 July 2026
Approved By	Board of Trustees

Policy Category (Please Indicate)	**1**	**Trust/Academies to use without amendment**
	2	Academy specific appendices
	3	Academy personalisation required (in highlighted fields)

Summary of Changes from Previous Version

Version	Date	Author	Note/Summary of Revisions
V1	July 2026	SGR	New Policy

TABLE OF CONTENTS

1.IMPORTANT CONTACTS 4

2.AIM 7

3.DEFINITIONS 7

4.STATEMENT OF INTENT 8

5.EQUALITY STATEMENT 11

6.ROLES AND RESPONSIBILITIES 12

7.ABUSE, NEGLECT and/or exploitation 20

8.SPECIFIC SAFEGUARDING ISSUES 22

9.EXTRA-FAMILIAL HARMS AND CONTEXTUAL SAFEGUARDING 38

10.CHILDREN AT INCREASED RISK OF ABUSE, NEGLECT AND/OR EXPLOITATION 44

11.PROCEDURES FOR MANAGING CONCERNS 50

12.WORKING WITH PARENTS/CARERS 52

13.STAFF TRAINING AND POLICIES 52

14.RECORDS AND INFORMATION SHARING 53

15.SAFER RECRUITMENT & DBS CHECKS 54

16.STAFF CONDUCT AND THE USE OF 'REASONABLE FORCE' 61

17.SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, (INCLUDING SUPPLY TEACHERS), VOLUNTEERS AND CONTRACTORS 61

18.LEGAL FRAMEWORK 69

APPENDIX 1: WHAT TO DO IF YOU SUSPECT OR ARE INFORMED OF A CHILD PROTECTION ISSUE OR HAVE A CONCERN 71

APPENDIX 2: WHAT TO DO IF A CHILD MAKES A DISCLOSURE 73

APPENDIX 3: WHEN TO MAKE A REFERRAL TO THE LOCAL AUTHORITY CHILDREN'S SOCIAL CARE 74

APPENDIX 4 - USEFUL CONTACT NUMBERS AND E-MAIL ADDRESSES/WEBSITES: 76

APPENDIX 5: CONTEXTUAL SAFEGUARDING: LOCAL RISK ASSESSMENT 78

1.IMPORTANT CONTACTS

Role	Name/Photo	Contact Details
Principal	Nicky Walker	NWalker@horburyacademy.com
Designated Safeguarding Lead (DSL)	Rachael Paul	RPaul@horburyacademy.com
Designated Teacher for LAC	Rachael Paul	RPaul@horburyacademy.com

Reviewed: July 2026

Deputy Safeguarding Lead (DDSL)	Amanda Kelly	AKelly@horburyacademy.com
Safeguarding Officer	Kerry Nichol	KNichol@horburyacademy.com
Designated Safeguarding Lead	Gill Gough	GGough@horburyacademy.com
Designated Safeguarding Lead	Jackie Easter	JEaster@horburyacademy.com

Reviewed: July 2026

Designated Safeguarding Lead	Donna Mitchell	DMtchell@horbruyacademy.com
Designated Safeguarding Lead	Joanne McGregor	JMcGregor@horburyacademy.com
Designated Safeguarding Lead	Joanne Manley	JManley@horburyacademy.com
Chair of Governors	Julie Tomlinson	JTomlinson@horburyacademy.com

Reviewed: July 2026

Link Safeguarding Governor	Julie Tomlinson	JTomlinson@horburyacademy.com
Trust Safeguarding Lead	Sara Graham	01709 288090 Info@placepartnership.com
Safeguarding Trustee	Rachel Denton	01709 288090 Info@placepartnership.com

2.AIM

The Academy aims to embed a whole school approach to Child Protection and Safeguarding and to ensure:

- Safeguarding is recognised as being everyone's responsibility.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff, including Trustees, governors, volunteers and temporary staff, are aware of their statutory responsibilities with respect to child protection and safeguarding.
- Staff are properly trained in recognising and reporting child protection and safeguarding issues, maintain a culture of vigilance and take an attitude of 'it could happen here.'.
- All staff, visitors, contractors, external activity providers and parents/carers have access to the Policy and work together in the best interests of children to keep them safe, well and protected from harm.
- Children feel listened to, supported in seeking support and reporting concerns, and their voice is actively sought.

3.DEFINITIONS

Keeping Children Safe in Education (September 2026) defines Safeguarding and promoting the welfare of children as follows:

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

Children refer to anyone under the age of 18, including those children in a pre-nursery, two-year old provision.

Safeguarding refers to the actions we take for all children to promote their welfare.

Child Protection refers to the actions we take when children are suffering, or likely to suffer, significant harm. Child Protection therefore falls under the wider remit of safeguarding but is a crucial element in protecting children from harm.

4.STATEMENT OF INTENT

The Academy recognises that safeguarding is everyone's responsibility. No one person can have oversight and knowledge of everything that is happening in children's lives, and it is therefore vital that the Academy maintains good working relationships with everyone who has contact with children including the children themselves, parents/carers, wider community and external agencies, particularly the 3 statutory safeguarding partners:

- The Local Authority
- The Integrated Care Board
- The Police
- The Children's Wellbeing and Schools Bill (2026) is driving reform through the Families First Partnership Programme which includes measures to strengthen the role of education within multi-agency safeguarding arrangements. Although not a statutory partner, education must be included within both operational and strategic decision making levels of safeguarding arrangements. To this end, Place Partnership Trust and its Academies are committed to working strategically with statutory safeguarding partners to contribute to the development of local safeguarding priorities while also working at an operational level with multi-agency professionals to support children where there are safeguarding concerns.

Good working relationships include timely information sharing processes which assist in identifying, assessing and responding to concerns in a manner which promotes the welfare of children and keeps them safe by intervening early with the right support at the right time. The Academy will be fully engaged, involved, included and act in accordance with local safeguarding arrangements, following its statutory duty to cooperate with local safeguarding partners when named as a relevant agency. The Academy will work through the Community Based Early Help and Targeted Early Help (Family Help) processes, contribute to multi-agency plans to provide additional support and allow access for Social Workers from the Local Authority when a section 17 or section 47 assessment is being conducted or considered.

The Academy takes the stance of 'it could happen here' and ensures that all staff are equipped with the knowledge and training which enables them to employ professional curiosity when they have any suspicion of children protection and safeguarding concerns; these suspicions may relate to matters arising both within the Academy workplace and/or where appropriate outside of the workplace (including online). We take a whole school preventative approach to child protection and safeguarding which is committed to promoting the welfare of all children both inside and outside of the school premises; in line with safeguarding legislation and statutory guidance this is achieved by:

- Ensuring that all staff, including Trustees, Governors, volunteers, and temporary staff, understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, neglect and/or exploitation and know to refer concerns to the DSL.
- Ensuring all staff understand that children can be at risk of harm inside (intra-familial) and outside (extra-familial) of their home, at school and online.
- Ensure a whole-school culture of inclusivity and anti-discriminatory practice is actively promoted.
- Teaching children how to keep safe and recognise behaviour that is unacceptable, including through a rigorous PSHE/RSHE curriculum.
- Identifying and making provision for any student that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Ensuring that all staff are aware of the wider risks and issues in the community in line with contextual safeguarding and extra-familial harms.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject, or identify people who might pose a risk to children.
- Ensuring that the Principal and any new staff, Trustees, Governors and/or volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Providing a robust induction process for new members of staff, including temporary members of staff which reflects the above principles, includes training and the Academy's Code of Conduct.
- Providing individual and/or group supervision for Designated and Deputy Designated Safeguarding Leads

INFORMATION SHARING AND CONFIDENTIALITY

The Academy understands that while the UK GDPR and the Data Protection Act (DPA) 2018, and the Data (Use and Access) Act 2025 place a duty on schools to process personal information fairly and lawfully, and for it to be kept safe and secure, they also allow information to be stored and shared for safeguarding purposes. 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 DPA 2018 and UK GDPR, and Data (Use and Access) Act 2025 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, neglect and/or exploitation as this may not be in the child's best interests. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing 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 DDSL. The DSL or DDSL will have due regard for the serious harms test when making decisions about information sharing.

For more information refer to Information sharing: advice for practitioners (publishing.service.gov.uk) and to the Data Protection Policy which aligns with the DfE Data Protection in Schools Guidance.

EARLY HELP: COMMUNITY BASED EARLY HELP (UNIVERSAL SERVICE) AND TARGETED EARLY HELP (FAMILY HELP)

Early help means providing support for children of any age which improves a family's resilience and outcomes or reduces the likelihood of a problem worsening, for example addressing non-violence harmful sexual behaviours and preventing escalation of sexual violence. Providing early help, rather than interventions later on, more effectively promotes the welfare of children.

The Academy will work with local agencies to put processes in place for the effective assessment of the needs of individual children who may benefit from universal services and community based early help services, as well as being mindful of when levels of need may require intervention at a Family Help level. In Keeping Children Safe in Education, Family Help is defined as 'both targeted early help and support and services delivered under s.17 of the Children Act 1989.' This means that qualified lead practitioners who are not necessarily social workers may lead up to and including Section 17.

Staff will be particularly alert to children who:

- Are disabled and have certain health conditions and/or have specific additional needs.
- Have special educational needs (whether or not they have a statutory Educational, Health and Care Plan).
- Have mental health needs.
- Are young carers.
- Are showing signs of being drawn into or engaging in anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are in a family circumstance presenting challenges for the child, such as drug and alcohol abuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol themselves.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have returned home to their family from care.
- Are privately fostered.
- Have family members in custody or are affected by parental offending.
- Are at risk of Honour or Faith-Based Abuse (HBA), such as Female Genital Mutilation (FGM) or forced marriage.
- Are frequently absent and/or missing from education, this includes frequent absences for part of the school day.
- Have experienced multiple suspensions, part time timetables, attendance at an Alternative Provision or Pupil Referral unit, and/or at risk of being permanently excluded.
- Are showing early signs of abuse, neglect and/or exploitation in other ways.
- Are pregnant, or parents themselves.

The DSL will take the lead where community based or targeted early help is indicated, including liaising with other agencies and setting up an inter-agency assessment as appropriate and in line with the local processes. Other staff, including the wider inclusion team, may be required to support other agencies and professionals in an Early Help assessment/Family Assessment of Need, and in

some cases act as the lead practitioner. The DSL will keep any such cases under constant review, including the monitoring of any interventions, and give consideration to a referral to the Local Authority Children's Social Care for a statutory assessment if the child's situation is not improving or is worsening.

5.EQUALITY STATEMENT

The Academy recognises that some children are particularly vulnerable, at increased risk of abuse, neglect and/or exploitation both online and offline, and that additional barriers may exist for some children in respect of recognising or disclosing that they are suffering or are at risk of suffering abuse, neglect, exploitation and/or modern slavery. The Academy has due regard for all children, extending an equal level of protection which is cognisant of a child's diverse circumstances and barriers they may face, and which reflects anti-discriminatory practice.

In line with the Equality Act 2020 the Academy aims to eliminate discrimination, advance equality of opportunity and foster good relations between different people. Local processes for reporting any incident of hate crime, where unlawful bias is evidenced towards those with protected characteristics, and violent crime are followed.

We are particularly aware that the following children may be vulnerable:

- Children with Special Education Needs and Disabilities (SEND) and/or health conditions.
- Children with other protected characteristics (eg race, religion, gender identification, sexuality) which might lead to them being discriminated against.
- Children who have English as an additional language.
- Children who are asylum seekers.
- Children who are young carers.
- Children who attend the Early Years Foundation Stage
- Children known to be living in difficult situations (eg temporary accommodation or in households where there are issues such as substance abuse or domestic abuse).
- Children at risk of FGM, Forced Marriage, Exploitation or Radicalisation.
- Children who are at risk due to their own and/or a family member's mental health needs.
- Children who are in care, previously in care or otherwise have a social worker involved.
- Children who are persistently absent or missing from education. Children whose parent/carer has expressed an intention to remove them from school to be home educated.

SPORT

The Equality Act (2010) mandates that schools must not unlawfully discriminate against students or staff based on a protected characteristic. It does allow for positive action and reasonable adjustments in dealing with disadvantages affecting students and staff with a protected characteristic so that their needs can be met. It also contains an exception in terms of single-sex sport.

Where differences in physical strength, stamina or physique do not create a disadvantage and/or safety concern in competitive sport activities then single-sex groups do not have to be applied. Requests for different arrangements, including to support social transition, should be considered. However, when these factors do present a safety concern and/or disadvantage for either sex, then single-sex sport arrangements will be used to promote fairness as well as safety. The Academy will make decisions about sporting arrangements for students who request specific arrangements on a case-by-case basis.

TOILETS AND CHANGING ROOMS

In line with the School Premises (England) Regulations 2012 the Trust provides separate toilets for boys and girls aged 8 and over. The exception is individual toilets intended for single person use only; these toilets must be lockable from the inside. Similarly, in line with these regulations, changing facilities are provided so that no child who is 11 years or older at the start of the school year is required to undress or shower in front of a child from the opposite sex. For children who do not want to use the facilities designated for their sex, alternatives should be considered but the provision of single-sex facilities must not be compromised.

6.ROLES AND RESPONSIBILITIES

ALL STAFF

It is the responsibility of every member of staff, including Trustees, Governors, volunteers, temporary staff and regular visitors to the Academy to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the students at the Academy. This includes the responsibility to provide a safe environment in which children and young people can learn.

All staff are expected to:

- Read at least Part One of Keeping Children Safe in Education 2026, confirm they understand and can apply the principles in everyday practice. (Staff will also be aware of the Part One Overview which can be used as a supplementary reference document but which does not replace the requirement to read Part One.)
- Read the updated Child Protection and Safeguarding Policy, confirm they understand and can apply the principles in everyday practice.
- Complete training, including online modules, as directed by the DSL; this includes further safeguarding for staff, the Prevent Duty, Online Safety, Sexual Violence and Sexual Harassment, Data Protection and GDPR for staff, Equality, Diversity and Inclusion.
- Receive and understand child protection and safeguarding updates which are delivered through a variety of mediums.
- Maintain an attitude of 'it could happen here' and act in the best interests of children.
- Understand that safeguarding issues often overlap and can result in children being at risk of harm.
- Be aware of behaviours and indicators which could suggest a child is at risk.
- Understand that racism, faith-based prejudice and other discrimination constitutes harm, and this form of abuse can significantly affect a child's welfare, wellbeing and sense of safety.

All staff will be aware of:

- Wider policies which support the Child Protection and Safeguarding which include, but are not limited to the:
    - Attendance Policy
    - Behaviour Policy

- Anti-Bullying Policy
- Online Safety Policy
- Supporting Students with Medical Conditions and First Aid Policy
- Whistleblowing Policy

- The identity of the Designated Safeguarding Lead (DSL) and Deputy Safeguarding Leads (DDSL).
- The role of Early Help and being able to identify when children might benefit from intervention.
- Their role in pro-actively identifying emerging problems, exercising professional curiosity, knowing the procedures for reporting concerns and doing so promptly, and liaising with the safeguarding team in school and/or other professionals if required.
- How to refer concerns to the Local Authority Children's Social Care and/or Police if a situation is deemed urgent, with the risk of serious harm to a child, and a member of the safeguarding team cannot be located and informing the DSL of these actions in retrospect.
- What to do if a child discloses, they are being abused, neglected and/or exploited and of their statutory duty in respect of FGM.
- How to maintain appropriate levels of confidentiality when dealing with children at risk of or suffering harm.
- The signs of different types of abuse, neglect and/or exploitation as well as specific safeguarding issues such as child-on-child abuse (including harassment and violence), child sexual exploitation, child criminal exploitation, risk of serious violent crime, racism, honour or faith-based abuse (HBA) including FGM and radicalisation.
- The potential impact of adverse childhood experiences on mental health and correlation with risk taking behaviour, and with domestic abuse and/or substance misuse in the home as well as poor parental/carer mental health.
- The risks associated with online technology including the consensual and non-consensual sharing of nudes and semi-nudes (sometimes referred to as self-generated intimate images and/or videos) including those generated using AI e.g. deepfakes".
- Their responsibilities and expectations of them in respect of filtering and monitoring systems.
- The risks associated with children missing and/or absent from education, or potentially being withdrawn from school by parents/carers for home education.
- The importance of reassuring victims that they are being taken seriously, that they have done the right thing in disclosing concerns and should never feel ashamed, and that they will be supported and kept safe. A victim of any form of abuse, neglect and/or exploitation should never be given the impression that they are creating a problem by making a report.
- Be aware that some children may not feel ready, or know how to tell someone, that they are being abused, exploited or neglected and/or not recognise their experiences as harmful; this may be through feelings of embarrassment, humiliation or fear and reflect vulnerability, disability, sexual orientation and/or language barriers. Staff will non-the-less maintain professional curiosity and speak to the DSL if they have any concerns.
- The imperative of creating a culture where children identifying as LGBTQ+ can speak out or share their concerns with a trusted adult.

THE DESIGNATED SAFEGUARDING LEAD

The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team and responsible for child protection and safeguarding at the Academy, including online safety and Prevent. The DSL and Deputy DSL's (DDSL's) will be available during term time and within school hours to discuss safeguarding concerns and to make decisions about concerns which might include:

- Managing any support for the child(ren) internally through existing pastoral and inclusion processes.

- Undertaking an early help assessment/family assessment of need.
- Making a referral to statutory services where the child(ren) might be in need or suffering, or is likely to suffer, harm.

In certain circumstances the DSL, DDSL's, Principal or Trust Safeguarding Lead may be contactable by email or other discrete means outside of these hours and in school holiday periods. However, the Trust has implemented a confidential email which ensures that concerns from safeguarding partners can be received and acted on by all members of the Academy safeguarding team, and isn't reliant solely on the availability of the DSL.

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

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring processes and systems in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so; this will include discussions and agreements with statutory safeguarding partners to determine the levels for different types of assessment as part of local arrangements.
- Contribute to the assessment of children, and/or support other staff to do so, including Early Help assessments/Family assessments of need.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:

    - To the Local Authority Children's Social Care where abuse, neglect and/or exploitation are suspected, and support staff who make referrals to Children's Social Care. This includes enquiries relating to the Channel programme where radicalisation concerns arise.
    - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
    - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.

- Act as a source of support, advice, and expertise for all staff.
- Act as a point of contact with the three safeguarding partners.
- Liaise with the Principal (where the DSL is not the Principal) to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the Deputy DSL(s) to ensure effective safeguarding outcomes.
- Liaise with the Principal (where the DSL is not the Principal) and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the Senior Mental Health Lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Principal (where the DSL is not the Principal), members of SLT and other relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing,

or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:

- Ensuring that key staff know which children have or had a social worker, and that they understand the confidential nature of this information.
- Understanding the academic progress and attainment of these children.
- Maintaining a culture of high aspirations for these children.
- Supporting teachers to provide additional academic support or reasonable adjustments to help these children reach their potential.
- Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these children are experiencing with teachers and the SLT.

- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a student's child protection file is transferred as soon as possible, and within five days, when transferring to a new school this information should be transferred separately to the main student file.
- Ensure that a record is kept of when files have been transferred to a new school, including information on how the files were shared and by what means; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery.
- Consider any information which would be appropriate to share with a child's new educational setting in advance of them leaving, particularly where this would support an assessment of risk for the student and/or others. This might include children with a social worker, those receiving support from the Channel programme and/or incidents which indicate concerns about serious violence or harmful behaviours.
- Ensure each member of staff has access to and understands the Academy's Child Protection and Safeguarding Policy and procedures, including during the induction process for new members of staff.
- Work with the Trust Board and Academy Education Committee to ensure the Academy's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the Academy's Child Protection and Safeguarding Policy is available publicly, and parents/carers are aware that the school may make referrals for suspected cases of abuse, neglect and/or exploitation, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Be aware that children must have an 'appropriate adult' to support them in the case of a police investigation or search.
- Undergo training which includes enhanced PREVENT awareness, and update this training at least every two years, and to ensure that any named DDSLs also attend and update their training every two years.
- Maintain a good understanding of harmful sexual behaviour, be aware of local specialist support for victims and alleged perpetrators, and work with safeguarding partners in terms of the response to sexual violence and sexual harassment.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties children may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters specifically, to ensure that staff are supported during the referrals

processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR, and the Data (Use and Access) Act 2025.
- Keep detailed, accurate, secure written records of concerns and referrals which include a clear account of discussions, actions and decisions taken to follow up, resolve and reach an outcome, including the rationale for these decisions. This may include instances where referrals to other agencies including social care or Prevent were or were not accepted. These records will be sampled periodically by Executive Leaders.
- Carry out their role in accordance with the responsibilities outlined in Annex B of Keeping Children Safe in Education 2026.

THE ACADEMY EDUCATION COMMITTEE AND TRUST BOARD

The Academy Education Committee in the Academy, and the Trust Board for the organisation, takes strategic leadership for the safeguarding arrangements in the Academy and is accountable for ensuring the effectiveness of this and other appropriate policies and that procedures described are in place. Although the Academy Education Committee takes collective responsibility to safeguard and promote the welfare of our students, there is also a named Link Governor who champions safeguarding within the Academy (this is a different person to the DSL), liaises with the Principal and Designated Safeguarding Lead and is able to provide information and reports to the Academy Education Committee. The Maltby Learning Trust also has a Trustee with leadership responsibility for safeguarding across the organisation.

The Place Partnership Trust Board and Academy Education Committee will ensure that:

- The Academy Principal, members of the SLT and both DSL's and DDSL's read Keeping Children Safe in Education 2026 in its entirety: Keeping children safe in education - GOV.UK
- The Academy takes a whole-school approach to safeguarding, and that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Online safety is a running and interrelated theme within the whole school approach to safeguarding and related policies.
- The Academy has appropriate filters and monitoring systems in place which satisfy the Department for Education standard, regularly reviews their effectiveness and both the leadership team and relevant staff are able to manage these effectively, consider which children are potentially at greater risk of harm, and know how to escalate concerns,
- The Child Protection and Safeguarding Policy is in place and is reviewed annually, is available publicly via our Academy website and has been written in line with 'Keeping Children Safe in Education 2026', Local Authority advice and the requirements of the Rotherham/Doncaster/Wakefield Safeguarding Children Partnership (LSCP) policies and procedures.
- The Principal is held to account for the effective implementation of the Child Protection and Safeguarding Policy, including allocating the appropriate time and resources to enable the Designated Safeguarding Lead to carry out the role.
- The Academy contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children (2026) and section 14B of the Children Act 2004; this means working with the three safeguarding partners and other services to promote the welfare of children and young people and protect them from harm, including the sharing of relevant information.

- The Academy has due regards to its obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).
- The Academy contributes to multi-agency plans to provide additional support to those children subject to child protection plans. This will mean that we will allow access to children's social care should they need to conduct a section 17 or a section 47 assessment (see chapter 1 of Working Together to Safeguard Children 2026 for more information on these assessments).
- The Academy complies with its duties under child protection and safeguarding legislation including the maintenance of child protection files and taking measures to secure more than one emergency contact number for each child.
- The Academy has due regard to the Prevent Duty Guidance 2023, under Section 26 of the Counterterrorism and Security Act 2015, which aims to prevent children and young people from being drawn into extremism and terrorism.
- The Academy has due regard to the mandatory reporting duty, which came into force in October 2015, of the Female Genital Mutilation Act 2003 which places a statutory duty on teachers (along with social workers and healthcare professionals) to report to the Police where they discover that FGM appears to have been carried out on a girl under 18 years.
- A member of the Senior Leadership Team in the Academy is designated to take the lead responsibility for safeguarding and child protection as a specific part of their role description, and that there is a named deputy member of staff identified to deal with any issues in the absence of the Designated Safeguarding Lead professional. There will always be cover for this role.
- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children including due regard to relevant data protection principles that allow them to share and withhold personal information.
- All staff receive a safeguarding induction and are provided with a copy of this policy, as well as Part One of Keeping Children Safe in Education 2026 and the Academy's Code of Conduct. (Staff will also be aware of the Part One Overview which can be used as a supplementary reference document, but which does not replace the requirement to read Part One.)
- All staff undertake appropriate safeguarding and child protection training that is updated regularly; in addition, all staff members will receive safeguarding and child protection updates (for example, via e-mail, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- The Academy Governors will also undertake appropriate training, including online training at induction which is regularly updated to ensure they are able to carry out their duty to safeguard all of the children at our school by:

    - Having the knowledge and information needed to perform their functions and understanding their responsibilities, such as providing strategic challenge.
    - Testing and being assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.
    - Training for Governors to support them in their safeguarding role is available from the National College well as Online Learning procured by Place Partnership Trust or delivered by the Trust Safeguarding Lead.

- Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Systems are in place to enable children to confidently report abuse, neglect and/or exploitation knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible

- That children are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Establish an Early Help procedure and ensure all staff understand the procedure and their role in it.
- Ensure that staff are appropriately trained to support students to be themselves at school, eg if they identify as LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health and/or physical problems in students, including clear routes to escalate concerns and clear referral and accountability systems. This includes the recognition that children with SEND can face additional barriers to any abuse, neglect and/or exploitation being recognised.
- Guarantee that there are procedures in place to handle children's allegations against other children.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse (including harassment and violence),.
- Guarantee that volunteers are appropriately supervised if full safer recruitment checks haven't been undertaken.
- Appoint a designated teacher of LAC to promote the educational achievement of children in care and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the Virtual School Head (VSH) to discuss how the student premium funding can best be used to support children in care (CIC).
- Make sure that staff members have the skills, knowledge and understanding necessary to keep children in care safe, particularly with regard to the student's legal status, contact details and care arrangements.

Put in place appropriate safeguarding responses for students who are persistently absent and/or go missing from school, particularly on repeat occasions and where the absence is unexplainable, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future. Procedures are in place for dealing with allegations against members of staff, including Governors, volunteers, supply teachers and agency staff in line with Part Four of Keeping Children Safe in Education 2026 and RSCP guidance Allegations Against Staff, Carers and Volunteers including:

  - Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
  - The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate (See separate Managing Allegations Against Staff Policy)

- Safer recruitment practices are followed in accordance with Part Three of 'Keeping Children Safe in Education' (2026) and also Chapter 5 of RSCP Child Protection Procedures. Guidance for Safe Recruitment, Selection and Retention...including:

  - Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
  - Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.

- Ensure that all members of the Local Governance Committee have been subject to an enhanced DBS check and other mandatory safer recruitment checks.

- Procedures are in place to ensure employing agencies confirm safer recruitment checks have been undertaken for staff who come into school, that the MLT Guidance for Visitors is being followed and safeguarding requirements are a condition of using the school premises.
- The Trustees/Academy Governors remedy without delay any weakness in regard to the Academy safeguarding arrangements that are brought to their attention.
- The Trustees/Academy Governors ensure all relevant persons are aware of the Academy's local safeguarding arrangements, including the Academy Education Committee itself, the SLT and DSL.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

Safeguarding will be a standing item on Academy Education Committee agendas. Governors will receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the Academy. There will be a minimum of one full safeguarding report from the Designated Safeguarding Lead annually. Updates and the report will show all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual children.

THE PRINCIPAL

The Academy Principal will ensure that the above policies and procedures, adopted by the Trust, are fully implemented, and followed by ALL staff and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.
The Principal is also responsible for:

- Identifying a member of the Senior Leadership Team to be the Designated Safeguarding Lead (DSL) or acting in this role themselves and understanding that this role includes leading on Prevent and online safety across the Academy, including the oversight of filtering and monitoring systems and processes.
- Identifying an alternate member of staff to act as the Deputy Designated Safeguarding Lead (DDSL) in his/her absence to ensure there is always cover for the role.
- Providing the time, funding, training, resources and support to the DSL and Deputy DSL to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and to support other staff to do so – and to contribute to the assessment of children and young people.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.
- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction, and understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and/or exploitation.
- Ensuring that all staff, including Governors, volunteers, Supply Teachers and agency staff feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaising with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff, including governors, volunteers, trainee teachers, supply teachers, external agency staff and contractors. This would include

transferable risks, relating to incidents outside the Academy which might not include children, but which meet the Harm Test.

- Making decisions regarding all low-level concerns although this may be in collaboration with the DSL.
- Ensuring that if any allegations of a safeguarding nature are raised about a Supply Teacher, who is not directly employed by the Academy, this will be dealt with properly by the Academy. The Academy will not cease to use the supply teacher without finding out all the facts and liaising fully with both the employing agency and the LADO to determine a suitable outcome. This may include decisions relating to whether to suspend the supply teacher or redeploy them to another part of school while investigations are underway.
- Ensuring the Academy is aware of and will follow the local safeguarding arrangements.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Appointing a Designated teacher who has a responsibility for promoting the educational achievement of children in care and previously in care (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales, and ensuring these duties are effectively discharged.

7.ABUSE, NEGLECT AND/OR EXPLOITATION

All staff will be aware of and be vigilant to the indicators of abuse, neglect and/or exploitation, will know the appropriate actions to take following a child being at risk of abuse, neglect and/or exploitation and raise concerns promptly with the DSL. They will be aware that safeguarding incidents and/or behaviours associated with factors outside the school can/or can occur between children outside of these environments. This includes being aware that children can be at risk of abuse or exploitation in situations outside their families (extra-familial harms), both online and offline.

Abuse is defined as maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused and/or exploited in a family, institutional or community setting by those known to them or by others, e.g., via the internet. Abuse and/or exploitation can take place wholly online (including cyberbullying and the making and sharing of nudes and semi-nudes including those generated using AI e.g. deepfakes/deep nudes), or technology may be used to facilitate offline abuse. Abuse and/or exploitation may take place online and offline concurrently. Children may be abused by one or multiple adults or another child or children. Abuse, including neglect and/or exploitation, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap across different categories of abuse. The four different categories of abuse are defined as:

PHYSICAL ABUSE

Physical abuse involves actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child.

Physical abuse can happen in any family, but children may be more at risk if their parents/carers have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse. Physical abuse can also occur outside of the family environment. Some of the following signs may be indicators of physical abuse:

- Children with frequent injuries
- Children with unexplained or unusual fractures or broken bones
- Children with unexplained bruises or cuts, burns or scalds or bite marks

EMOTIONAL ABUSE

Emotional Abuse is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate; this constitutes verbal abuse and includes belittling them, name calling and/or persistently criticising them It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying and online bullying through social networks, online games or mobile phones by peers, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may also occur alone. Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong.
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder'.
- Parents or carers blaming their problems on their child.
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

SEXUAL ABUSE

Sexual abuse is defined as abuse that involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving a high level of violence, and regardless of whether the child is aware of what is happening. This 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. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be perpetrated by people of any gender and age; it is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual abuse is any sexual activity with a child. Many children who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. It is important to remember that child sexual exploitation is a form of sexual abuse (see further information below). There are specific offences relating to children; children under 13 can never provide valid consent to sexual activity and specific offences make it clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Sexual abuse can have a long-term impact on mental health. Some of the following signs may be indicators of sexual abuse:

- Children who display knowledge or interest in sexual acts inappropriate to their age.
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have.
- Children who ask others to behave sexually or play sexual games.
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

NEGLECT

Neglect is defined as 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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.
- Neglect of, or unresponsiveness to, a child's basic emotional needs.

Children who are neglected often also suffer from other types of abuse and/or exploitation and it is not always straightforward to identify. It is important that staff remain alert and do not miss opportunities to take timely action. Neglect may occur if a parent/carer becomes physically or mentally unable to care for a child. A parent/carer may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child.

Some of the **following** signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe.
- Children who are left hungry or dirty.
- Children who are left without adequate clothing, e.g. not having a winter coat.
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence.
- Children who are often angry, aggressive or self-harm.
- Children who fail to receive basic health care.
- Parents/carers who fail to seek medical treatment when their children are ill or are injured.

8.SPECIFIC SAFEGUARDING ISSUES

Staff are made aware of the following specific safeguarding issues through regular training opportunities including Online Learning, presentations on inset days, regular safeguarding bulletins and team meetings. Staff are aware that any concerns must be raised with the DSL/DDSL's and a written account provided which is factual and accurate, and either recorded on the CPOMS system or emailed to the Safeguarding team. They are aware of local early help and family help resources,

, of the 3 safeguarding partners, and that referrals can be made directly to social care if there is difficulty in locating the DSL or DDSL's when a concern is urgent:

Rotherham Multi-agency Safeguarding Hub (MASH): 01709 336080

City of Doncaster Council Children's Services – Social Care and Safeguarding: 01302 737777

Wakefield Multi-agency Safeguarding Hub (MASH): 0345 8503503

DOMESTIC ABUSE

The Domestic Abuse Act 2021 defines domestic abuse as abusive behaviour of a person towards another person (including conduct directed at someone else, eg the person's child), where both are aged 16 or over and are personally connected. **'Abusive behaviour'** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. **'Personally connected'** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Types of domestic abuse therefore include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children which can also include sexual harassment) and child/adolescent to parent/carer violence and abuse. 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. In some instances, children may have had to leave the family home and may blame themselves for the abuse. The Academy recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse; this can include serious, long-lasting emotional and psychological impact on children which can affect their health, wellbeing, development and ability to learn.

All staff will be aware of the signs of domestic abuse and follow appropriate safeguarding procedures where concerns arise. They will also be aware of the offence of non-fatal strangulation and the dangers associated with it including risk of brain damage, miscarriage, stroke and death.

Further information on Domestic Abuse and the impact on children are contained within Annex A of 'Keeping Children Safe in Education 2026' and also in Chapter 2of the RSCP child protection online procedures: Safeguarding Children at Risk because of Domestic Abuse

Operation Encompass

The Academy engages with the 'Operation Encompass' scheme; this is a partnership between Police and Education, supported by each Local Safeguarding Children's Partnership. Operation Encompass has been designed to provide support for any child in school who may be affected by a domestic abuse incident where the police have attended. The DSL and Deputy DSL in the Academy will be informed when a domestic abuse incident has been recorded within the previous 24 hours or over the weekend. This will enable the Academy to monitor children possibly affected

and, where required, support if necessary. This will remain confidential; limited information about specific incidents is shared with school. The Academy will, however, be able to make provision for possible difficulties experienced by children who have been involved in, affected by, or witnessed a domestic abuse incident. The Academy is committed to offering the best support possible for our children and we believe Operation Encompass enhances the safeguarding within school and is beneficial for all those involved. All operation encompass notifications will be logged on CPOMS.

Further information on Operation Encompass, including a helpline for schools, can be found at: Home: Operation Encompass

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and DDSL's will be aware of contact details and referral routes into the local housing authority so they can raise or progress concerns over homelessness at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care. It is also understood that for 16- and 17-year-olds, homelessness may not be family based and referrals will be made to social care as necessary where concerns are raised.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

'HONOUR OR FAITH-BASED' ABUSE (INCLUDING FGM AND FORCED MARRIAGE)

Honour or faith-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 then follow local safeguarding procedures.

Female Genital Mutilation (FGM)

FGM is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK, as is 'virginity testing' or hymenoplasty, and a form of child abuse with long-lasting harmful consequences. FGM typically takes place between birth and around 15 years old. 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.

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.

- A family/student already being known to social services in relation to other safeguarding issues.

A girl may be observed as:

- 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 student 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/carer 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 may be observed as:

- 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; summer holiday periods are times of heightened risk.
- 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).
- Having parents/carers who attempt to withdraw her from learning about FGM in PSHE.
- 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.

If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with the Local Authority Children's Social Care and/or the Police. The school's procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements. As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Teachers failing to report such cases may face disciplinary action.

Teachers will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless

the teacher has a good reason not to, they must also consider and discuss any such case with the DSL and involve Children's Social Care as appropriate. This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, the DSL will follow local safeguarding procedures.

More information on these issues is contained in Annex A of Keeping Children Safe in Education (2026) and Chapter 2 of the Rotherham Safeguarding Children Partnership (RSCP) Child protection online procedures: Safeguarding Girls and Young Women at Risk of Abuse...

Forced marriage

Forcing a person into marriage is a crime and is a form of HBA. A forced marriage is one entered into without the full and free consent of one 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. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND.

Staff will receive training around forced marriage and the presenting symptoms. The Academy is aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a student is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- Speak to the student 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 fmu@fco.gov.uk

All staff will be alert to the indicators that a student is at risk of, or has undergone, forced marriage, including, but not limited to, the child:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Regularly being absent from school.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early.

From February 2023 it has also become a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if threats, coercion and violence are not used. As with Forced Marriage law, this also applies to non-binding, unofficial marriages.

More information on these issues is contained in Annex A of Keeping Children Safe in Education (2026) and Chapter 2 of the Rotherham Safeguarding Children Partnership (RSCP) Child protection online procedures: Safeguarding Children and Young People from Forced Marriage

PREVENTING RADICALISATION

The Academy has due regard to the Prevent Duty Guidance 2023, under Section 26 of the Counter-Terrorism and Security Act 2015, which aims to protect children and young people from being drawn into extremism and terrorism. This forms part of the Academy's wider safeguarding obligations.

The Academy understands the following definitions:

- **Extremism** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces. A new definition of extremism was published in March 2024 which refers to the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to negate or destroy the fundamental rights and freedoms of others; undermine, overturn or replace the Uk's system of democracy, intentionally create a permissive environment for others to achieve these results.
- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to protection and prevent children from being drawn into terrorism and radicalisation. The DSL will undertake enhanced Prevent awareness training and 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 school being drawn into 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.

The Academy will ensure that they engage with parents/carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the child's parents/carers, unless the Academy has reason to believe that the child would be placed at risk as a result.

In the Academy we use age-appropriate curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain; this can be evidenced in both the RSHE curriculum and the tutor time programme. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

We will ensure that suitable internet filtering and monitoring systems are in place which meet the Department for Education Standards and equip our students to stay safe online at school and at home. This is evidenced in our E-Safety Policy on the Academy website.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in children's behaviour. The government website Educate Against Hate and charity NSPCC state that signs that a student 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 Facebook or Twitter.
- 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 must have confidence in their instincts and seek advice if something feels wrong. If staff are concerned about a child, they must speak to the DSL to agree a course of action. If the DSL or DDSL is not available then the staff member must speak to a member of SLT or seek advice from the Local Authority Children's Social Care, including making a referral if necessary.

Ordinarily, the DSL will discuss with Children's social care and/or Prevent Team the need for a referral to Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism. The Academy understands, however, that referral to Channel is voluntary, and consent is required from the proposed participant.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a student. Schools can also email counter.extremism@education.gov.uk.

In an emergency, the DSL or another member of staff must call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

- 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.

More information on Prevent and Channel is contained in Annex A of Keeping Children Safe in Education (2026)and Chapter 2of the Rotherham LSCP child protection online procedures: Radicalisation, Terrorist and Extremist Ideology

CHILD ON CHILD ABUSE

The Academy recognises that children can abuse other children and takes a zero-tolerance approach to all forms of abuse, including child-on-child abuse (including harassment and violence),. Child-on-child abuse (including harassment and violence), is defined as abuse between children and therefore occurs where everyone directly involved is under the age of 18. Child on child abuse (including harassment and violence), therefore, occurs when a young person is exploited, bullied and / or harmed by a peer, or a group of their peers who are the same or similar age; child-on-child abuse (including harassment and violence), can relate to various forms of abuse (not just sexual abuse and exploitation).Child-on-child abuse (including harassment and violence), can occur between children of any age and gender, both inside and outside of school, face-to-face and/or online, and sometimes simultaneously between the two.

At the Academy, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children. Child-on-child abuse is preventable and by working in an early intervention and preventative manner, staff are able to identify emerging concerns early and ensure support is put in place before difficulties escalate. However, all staff in the Academy are aware that safeguarding issues can manifest themselves via child-on-child abuse (including harassment and violence), which is likely to include one or more of the following elements:

- Bullying, including online/cyber bullying and prejudice-based or discriminatory bullying.
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. This may also include an online element which facilitates, threatens and/or encourages physical abuse.
- Serious physical assault and harm, or the threat of harm with a weapon
- Sexual violence such as rape, assault by penetration and sexual assault. This may include an online element which facilitates, threatens and/or encourages sexual violence; – the Academy will follow guidance in Part 5 of Keeping Children Safe in Education (2026) on how to manage reports of child-on-child sexual violence and sexual harassment (see below).
- Sexual harassment, such as sexual comments, remarks, jokes and including online sexual harassment which may be standalone or part of a broader pattern of abuse; – the Academy will follow guidance in Part 5 of Keeping Children Safe in Education (2026) on how to manage reports of child-on-child sexual violence and sexual harassment (see below).
- 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.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- The making and sharing of nudes and semi-nudes (sometimes referred to as self-generated intimate images and/or videos) including those generated using AI e.g. deepfakes and deep nudes. (Further guidance is provided by the UK Council for Child Internet Safety (UKCIS) published in 2024: 'Sharing nudes and semi-nudes: advice for education settings working with children and young people).
- Initiation (sometimes referred to as 'hazing') type violence and rituals/gang activity; this can 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.
- Forcing someone to use drugs or alcohol.
- Abuse within intimate personal relationships between peers (also known as teenage relationship abuse).

All staff in the Academy are clear about the action to take where concerns about child-on-child abuse (including harassment and violence), arise, including speaking to the DSL. All staff understand their role in preventing child-on-child abuse (including harassment and violence), and responding where they believe a child is at risk from it; this will include always reassuring victims that they are being taken seriously, that they have done the right thing in reporting it, that there is no reason for them to feel ashamed, that they will be supported and kept safe. Children are made aware of how to raise concerns or make a report and how any such report will be handled. This includes the process for reporting concerns about friends or peers.

All staff are aware that students of any age and sex are capable of abusing other children, understand the importance of challenging inappropriate behaviour and will never tolerate abuse as "banter" or "part of growing up". We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the Academy Anti-

Bullying and Behaviour Policies, alongside Safeguarding procedures. At the same time, the Academy will consider the ages and stages of development of the children involved when an instance of harmful sexual behaviour between children occurs.

The Academy undertakes to provide support for victims of child-on-child abuse (including harassment and violence), and apply sanctions as appropriate in respect of perpetrators, which may include statutory agencies such as the police and/or social care but will also seek to understand reasons for the perpetrator's behaviour and consider supportive interventions; the Academy recognises that children displaying harmful sexual behaviour have often experienced their own abuse and trauma. Child-on-child abuse is therefore a safeguarding issue for the alleged perpetrator as well as the victim. Staff are aware that there is often a gendered nature to child-on-child abuse (including harassment and violence),; females may be more affected by sexualised or aggressive touching or grabbing while males may by more affected by initiation or hazing type violence.

All staff are additionally aware of the heightened vulnerability of students with Special Educational Needs and Disabilities (SEND). Staff will not assume that possible indicators of abuse, neglect and/or exploitation relate to the student's SEND and will always explore indicators further. Likewise, staff are aware of the heightened vulnerability of LGBTQ+ children. In some cases, children who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse, neglect and/or exploitation as LGBTQ+ children. The school's response to sexual violence and sexual harassment between students of the same sex will be equally as robust as it is for incidents between children of the opposite sex. The Academy is aware that evidence suggests children with SEND and/or identifying as LGBTQ+ are more likely to be abused or targeted by their peers.

Staff will be particularly mindful of the mantra 'it could happen here' and be aware that victims of child-on-child abuse (including harassment and violence), may not always make a direct report. It is therefore important to be vigilant to the following, and report to the DSL if:

- A child shows signs or act in ways they hope adults will notice and react to.
- A friend makes a report.
- A member of staff overhears a conversation.
- A child's behaviour might be indicative that something is wrong.
- A child is harming a peer, this could also be a sign that the child is being abused themselves.

The Academy is aware that the term 'victim' is widely used and recognised but not everyone who has been subject to abuse perceives themselves as a victim. Staff will be prepared to use a term that the child feels most comfortable with. This perspective will also be taken with alleged perpetrators/perpetrators as the behaviour may have been harmful to them too. Every incident of child-on-child abuse (including harassment and violence), will be managed on a case-by-case basis.

Harmful Sexual Behaviour including Sexual Violence, Sexual Harassment, Misogyny and Misandry

Harmful sexual behaviour (HSB), including sexual violence and sexual harassment can occur between two children of any age and sex, or through a group of children towards a single child or group of children. The Academy recognises that children's sexual behaviour exists on a wide continuum from normal and developmentally expected to developmentally inappropriate and harmful. Harmful sexual behaviour might result in problematic, abusive or violent behaviours which can occur online, face-to-face or both.

Children who are victims of harmful sexual behaviour will likely find the experience stressful and distressing and the experience is likely to adversely affect their mental health and educational attainment. Harmful sexual behaviour, including sexual harassment and sexual violence are never

acceptable. The Academy takes all incidents of child-on-child abuse, including sexual violence and sexual harassment seriously and ensures victims are taken seriously and offered appropriate support. The Academy ensures staff are aware of the gendered nature of child-on-child abuse (including harassment and violence), particularly in respect of sexual violence and sexual harassment, and that girls are more likely to be victims while recognising that other groups of vulnerable children are also potentially more at risk, including children with SEND and those identifying as, or perceived as being LGBT. The Academy is clear on the following points:

- Harmful sexual behaviour, including misogyny and misandry, sexual violence and sexual harassment are not acceptable, will never be tolerated and are not an inevitable part of growing up.
- Harmful sexual behaviour, including misogyny and misandry, sexual violence or sexual harassment can never be dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys". The Academy maintains a culture of zero tolerance for these abusive behaviours to ensure the environment is safe for children, and free from all forms of unacceptable behaviour including misogyny and misandry.
- Just because there are no reports of HSB doesn't mean it isn't happening; a culture of vigilance will be maintained.
- Behaviours such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts will always be challenged and potentially treated as a criminal matter.
- Dismissing or tolerating any of the above behaviour's risks normalising them and could make an individual complicit in a crime.

The age and developmental stage of children will be considered when assessing instances of HSB and appropriate support put in place for both victims and perpetrators. The Academy recognises that children who display HSB have often experienced abuse and trauma themselves. ***Sexual Violence***

The Academy understands that **consent** is about having the freedom and capacity to choose to engage in sexual activity. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that activity and have the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

Sexual violence refers to offences under the Sexual Offences Act 2003 as described below:

- **Rape**: A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus or mouth of another person (B) with their 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: they intentionally penetrate the vagina or anus of another person (B) with a part of their 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: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent**: A person (A) commits an offence if they intentionally cause 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.

Sexual Harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur online and offline, inside or outside of school. In the context of child-on-child abuse (including harassment and violence),, this policy refers to child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.
Sexual harassment can include, but is not limited to:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (such as pulling down trousers, flicking bras and lifting up skirts), grabbing bottoms, breasts and genitalia, and displaying pictures, photos or drawings of a sexual nature. (The Academy will always consider whether these cross a line into sexual violence by talking to and carefully considering the experience of the victim)
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence which may include consensual and non-consensual sharing of nude and semi-nude images and/or videos; sharing unwanted explicit content; sexualised online bullying; unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats; and upskirting.

Upskirting

Anyone of any gender or age, including children and adults, can be a victim of 'upskirting'. The Voyeurism (Offences) Act (commonly known as the Upskirting Act) came into force on 12 April 2019 and made 'upskirting' a criminal offence. 'Upskirting' is where someone operates equipment to record an image or take a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (whether exposed or covered with underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is not tolerated by the Academy and any incidents must be reported to the DSL who will then decide on an appropriate course of action.

Response to Reports of Harmful Sexual Behaviour

In the first instance, staff receiving a report from a child will reassure the child that they have done the right thing and will be taken seriously, be supportive and respectful, listen carefully in a non-judgemental manner and ask open questions but not promise confidentiality; even if a victim of abuse doesn't consent to information sharing then there is a legal basis under the UK GDPR which applies. Children reporting abuse will however be reassured that the law on child-on-child abuse (including harassment and violence), is there to protect them rather than criminalise them.

Notes must be made in an appropriate, factual fashion but in a way which does not interfere with the child's narrative. Where the concern includes an online element, due regard must be made to the searching, screening and confiscation advice (for schools) and UKCCIS advice (for schools and colleges). This is important in ensuring that unless it is unavoidable (in which case guidance in these documents must be followed), staff must not view or forward illegal images of a child (see separate section below). Ideally, two members of staff should be present while the report is being made including the DSL. If this is not possible, the DSL must be informed as soon as practically possible. The DSL will then formulate a risk assessment in response to a report of sexual violence, and on a case-by-case basis for sexual harassment to ensure adequate measures are in place to keep all children safe at the Academy, taking into account:

- the victim, especially their protection and support
- the alleged perpetrator, including any support needs (KCSiE2026 states that disciplinary action and sanctions, and providing appropriate support are not mutually exclusive actions and should occur at the same time if necessary;) and
- all the other children (and, if appropriate, adult students and staff) at the Academy, especially any actions that are appropriate to protect them.

The DSL will at all times follow guidance outlined in Part 5 of Keeping Children Safe in Education (2026) by considering the wishes of the victim, the nature of the alleged incident, including whether it constitutes a crime, is a one-off incident or a sustained pattern of abuse and the development stage, ages of and any power imbalances between the children, taking into account any vulnerabilities such as disability, learning need, environmental/systemic problems or wider issues in the local area.

The DSL will also consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and, if necessary, review policies and update staff training; this may include reminders of the challenges of detecting signs that a child has experienced sexual violence and the imperative to show sensitivity to their needs. Due regard will also be given to any intra-familial harms and the possibility of support needs for siblings.
The DSL will then consider further actions, which might include one or more of the following scenarios:

- Internally managed.
- Community Based Early Help (Universal Services)
- Targeted Early Help (Family Help)
- Referral to social care.
- Reporting to the police (alongside referral to social care) and maintaining a close working relationship if there are delays in the criminal process.
- Referral to the Children and Adolescent Mental Health Services (CAMHS).

Throughout the process, the Academy will liaise with all parties involved, including parents/carers to adequately support both the victim and perpetrator, including assessing the proportionality of the response. The Academy will have due regard for anonymity and protecting the anonymity of any children involved in a report of sexual violence or harassment, including how any support is offered and which staff are made aware; the potential impact of social media in facilitating the spreading of rumours and exposing identities will also be considered.

The Academy will also have due regard for school transport arrangements and other vulnerable places which may pose a risk to children following any incident or alleged incident while also implementing any measures possible to protect both victim and alleged perpetrator from bullying and/or harassment.

The making and sharing of nudes and semi-nudes (sometimes referred to as self-generated intimate images and/or videos) including those generated using AI e.g. deepfakes and deep nudes(known colloquially as sexting).

The consensual and non-consensual sharing of nude and semi-nude images and/or videos refers to the creation, sharing or posting of sexually explicit content, including indecent imagery by young people under the age of 18. Indecent imagery is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing.
- A child touching themselves in a sexual way.
- Any sexual activity involving a child.
- Someone hurting a child sexually.

- Sexual activity that involves animals.

The Academy ensures that staff are aware to treat the sharing of nude and semi-nude images and/or videos including those generated using AI as a safeguarding concern. Staff receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the student, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to children depicted in the images, and how and when to report instances of sexting.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that children are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sexting that involves indecent images of a child, they will refer this to the DSL as soon as possible. Where a child confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Not delete the imagery or ask the child to delete it.
- Not ask the child to disclose information about the imagery (this is the DSL's responsibility).
- Not share information about the incident with other members of staff, children, parents or carers.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the child that the incident will need to be reported.
- Respond positively to the child without blaming or shaming anyone involved, while reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of children, including where there is an adult involved, where there is an intent to harm the child depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of children where there is no adult involvement or apparent intent to cause harm or embarrassment to the student.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Discuss this decision with the Principal or member of the SLT.
- Ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
- Ensure viewing takes place on school premises and with another member of staff present in the room – this staff member does not need to view the imagery.
- Record how and why the decision was made to view the imagery in accordance with the Records Management Policy.

Where the incident is categorised as 'aggravated', the situation will be managed in line with the Academy's safeguarding procedures including referral to the Police and/or children's social care. This might include:

- The incident involved an adult.
- There is reason to believe that a child has been coerced, blackmailed or groomed.
- If there are concerns about their capacity to consent (for example due to Special Educational Needs).
- What the DSL knows about the images or videos suggest the content depicts sexual acts which are unusual for the child's developmental stage or are violent.
- The imagery involved sexual acts and any child in the images or videos is under 13.
- The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes or semi-nudes, for example if the child is presenting as suicidal or self-harming.

Where the incident is categorised as 'experimental', the children involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a child, the DSL escalates the incident to the Local Authority Children's Social Care. Where indecent imagery of a child has been shared publicly, the DSL will work with the child to report imagery to sites on which it has been shared and will reassure them of the support available.

The DSL will also make decisions about whether there is a need to contact another school, college, setting or individual and whether to contact the parents/carers of the child/children involved.

All incidents of sharing of nudes and semi-nudes (sometimes referred to as self-generated intimate images and/or videos) including those generated using AI e.g. deepfakes and deep nudes., and the decisions made in responding to them, will be recorded in accordance with the Academy's recording procedures, including decisions made in responding to them.

A Preventative Approach

In order to prevent child-on-child abuse (including harassment and violence), and address the wider societal factors that can influence behaviour, the Academy will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and Lifeskills/PSHE lessons. The Academy's preventative approach to education will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in Lifeskills/PSHE lessons, RHSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships.
- Respectful behaviour.
- Gender roles, stereotyping and equality.
- Body confidence and self-esteem.
- Prejudiced behaviour.
- Boundaries and consent.
- How to recognise an abusive relationship (including coercive and controlling behaviours
- That sexual violence and sexual harassment, and misogyny, is always wrong.
- Addressing cultures of sexual harassment. Students will be allowed an open forum to talk about concerns and sexual behaviour which include the sharing of nudes and semi-nudes including those generated using AI e.g. deepfakes and deep nudes. and how to manage request or pressures to provide or forward such images.
- They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

The Academy uses the RHSE curriculum to educate children and maintain a culture of zero tolerance for sexism, racism, misogyny, misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour and/or any other form of physical or verbal violence and conflict.

More information on child-on-child abuse/sexual violence (including harassment and violence), is contained in Part 5 and Annex A of Keeping Children Safe in Education (2026) and Chapter 2 of the RSCP child protection online procedures -Abuse by Children and Young People

ONLINE SAFETY

The use of technology has become a significant component of many safeguarding and wellbeing issues. The Academy recognises the importance of safeguarding children from potentially harmful and inappropriate online material. To address this, our Academy aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors.
- Protect and educate the whole school 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 school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on the following 4 categories of risk:

Content – exposure to illegal, harmful or inappropriate material; for example, pornography, extreme sexual or physical violence, self-harm, suicide, racist, misogynistic, antisemitic, radical and extremist views, misinformation, disinformation (including fake news) and conspiracy theories.

Contact – being subject to harmful online interaction with other users or generative AI applications that simulate this; for example, peer-to-peer pressure, commercial advertising as well as adults posing as children or young people with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct – personal online behaviour that increases the likelihood, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes including those generated using AI e.g. deepfakes and deep nudes.), sharing other explicit images, or online bullying.

Commerce - risks such as online gambling, inappropriate advertising, phishing and/or financial scams

The Academy/Trust recognises that today's students are growing up in an increasingly complex world, living their lives seamlessly on and offline. This presents many positive and exciting opportunities, but also challenges and risks. The Academy/Trust E-Safety Policy and day-to-day online e-safety procedures have due regard to the most recent DFE non-statutory guidance entitled 'Teaching online safety in school' (2019; updated 2023). This helps teach our students how to stay safe online, within both new and existing school subjects (including Relationships Education, Relationships and Sex Education, Health Education, Citizenship and Computing). We teach students about the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app. At our Academy, we understand the responsibility to educate our students about all online safety issues; teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of the classroom. This includes:

- 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 cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim.

The Academy provides training for staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation as well as expectations and responsibilities in respect of filtering and monitoring systems and processes. This is regularly refreshed for all staff.

All staff are aware of the E-Safety Policy which can be found on our website, and restrictions to using their own personal phones during the school day and will not take pictures or recordings of children on their personal phones or cameras. This extends to the use of smart glasses. No student is permitted to use a mobile phone or other personal electronic device whilst on the Academy site.

The Policy also outlines sanctions for staff where the Policy is not adhered to. The Academy Behaviour Policy also makes it clear that children are not permitted to use their personal phones while on the Academy site and outlines related sanctions if a student is in breach of this, or in breach of the acceptable use of the Academy's ICT systems or use of the internet. The Behaviour Policy also outlines the DfE's guidance on searching, screening and confiscation making it clear that staff have the power to search students' phones.

The Academy ensures that robust filtering and monitoring systems are in place on all school devices and networks to limit students' exposure to the four categories of risk as outlined above. Filtering and Monitoring systems are in line with the Department for Education standards,, and in accordance with the DfE 'Plan technology for your school' guidance, as follows:

- Staff are clear that everyone has a responsibility to be cognisant of filtering and monitoring systems and reporting suspicious activity. Those with particular responsibility for overseeing the effective of these systems include, but are not limited to, Governors, Executive and Senior Leaders (including the DSL), IT Network Managers.
- Filtering and monitoring provision is reviewed at least annually checks made on all internet-connected devices in all relevant locations are recorded.
- Harmful and inappropriate content is blocked without unreasonably impacting teaching and learning. Effective monitoring strategies are in place that meet the Academy's safeguarding needs; this includes adherence to the DfE guidance on 'Generative AI: Product Safety Expectations' to ensure that capabilities and features of generative AI products and systems are considered safe for users in schools.

We also aim to educate and reinforce the importance of online safety, including use of screentime, to parents and carers via our website, communications sent directly to them and during parents' evenings. We also ensure our safeguarding arrangements, including key personnel, are known so that parents and carers know how to raise concerns about online safety.

In the event of any remote education, parents and carers will be made aware of what we ask students to do online (e.g. sites they need to visit or who from the Academy they'll be interacting with online). The Academy will keep in regular contact with parents and carers; this will include reinforcing the need to keep children safe online and to provide information about the filtering and monitoring systems the Academy has in place.

We have a Safe Use of ICT Policy, which can be found on our Academy website; all members of the school community are required to sign an agreement regarding the acceptable use of the internet in school, use of the Academy's ICT systems and use of their mobile and smart technology.

Photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the Academy's Data Protection Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve students who are in care, adopted, or for whom there are security concerns, the Principal will liaise with the DSL to determine the steps involved. The DSL will, in known cases of students who are in care or who have been adopted, liaise with the student's social workers, carers or adoptive parents to assess the needs and risks associated with the student. A selection of useful links can be found on the safeguarding pages of our website and also in Annex A of Keeping Children Safe in Education (2026) and Chapter 2 of the RSCP child protection online procedures: Online Safety.

9.EXTRA-FAMILIAL HARMS AND CONTEXTUAL SAFEGUARDING

Safeguarding incidents can occur outside of school and outside of family homes and can be associated with extra-familial factors. School staff, particularly the DSL and their deputy, will always consider the context of incidents – this is known as contextual safeguarding. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare; this might include (but not be limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.. The school will provide as much contextual information as possible when making referrals to Children's Social Care.

Each Place Partnership Academy is required to outline where they are situated in terms of public spaces, main and minor roads, whether these roads pose potential safety issues and whether students therefore need to have a good understanding of the green cross code and stranger danger awareness. This applies similarly to any Place Partnership Academy which may be situated near a river, canal or area of water where understanding of water safety is needed. Each Place Partnership

Academy will document how staff communicate this awareness and understanding to students and parents. See **Appendix 5** for the Academy's local risk assessment.

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is defined as the unauthorised removal or retention of a child from a parent/carer or anyone with legal responsibility for the child. Child abduction can be committed by parents/carers and other relatives, other people known but not related to the victim (such as neighbours, family friends and acquaintances), and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing and attempting to engage in conversation with children.

Students will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors, particularly as they grow older and are given more independence (for example, as they start walking to and from school on their own). These will focus on building student's confidence and abilities rather than simply warning them about all strangers.

CHILD CRIMINAL EXPLOITATION (CCE)

Keeping Children Safe in Education (2026) defines CCE and CSE as follows: 'Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute Modern Slavery.

Victims of criminal exploitation may not be aware that they are being exploited and believe they activity to be consensual, particularly when there is no apparent violence or threats of violence.

Whilst age may be the most obvious, the power imbalance described above can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CCE can be physical and/or take place online, can be perpetrated by individuals and groups of any gender, by children and adults, and can a one-off occurrence or a series of incidents over times and range from opportunistic to complex organised abuse.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The Academy recognises that students involved in CCE are victims themselves regardless of whether they have committed crimes and even if the criminal activity appears consensual, and that any gender is at risk of CCE. All staff will be aware of the indicators that a child may be the victim of CCE This is additionally important as victims may may be sanctioned and even criminalised for actions they take while under coercion if the exploitation isn't recognised. Indicators include:

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

The Academy understands that the experience of girls who are criminally exploited can be different to that of boy and the indicators might differ. However, children of any gender can be criminally exploited and may also be at higher risk of sexual exploitation.

COUNTY LINES

County Lines refers to organised criminal networks and gangs involved in exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK using dedicated mobile phone lines or other form of 'deal line'. Children can be targeted and recruited into county lines in a number of locations including educational establishments often through coercion,

intimidation, violence (including sexual violence) and weapons. Children are being increasingly targeted and recruited online using social media. They might then be trapped into county lines activity by the creation of drug debts which need to be worked off and threats of serious violence and kidnap towards them and their families to ensure compliance and preventing them from leaving the county lines network. Children may be required to store drugs and money for the purpose of criminal activity but also recruited to move drugs and money between locations which might mean they are exposed to techniques such as 'plugging' where drugs are concealed internally in the body.

Staff will be made aware of students with unexplainable and/or persistent absences or missing episodes who may have been trafficked for the purpose of transporting drugs. If a staff member suspects a student may be vulnerable to, or involved in, county lines activity they will immediately report all concerns to the DSL who will then discuss with the Local Authority Children's Social Care as well as considering referral the National Referral Mechanism and other local providers and services who offer support to victims of county lines and exploitation.

As well as the indicators above for CCE, all staff will be aware of the specific indicators that a child may be involved in county lines activity include the following:

- Persistently and/or unexplainably being absent and/or going missing from home, care and/or education and subsequently being found in areas away from their home.
- Excessive receipt of texts or phone calls which may suggest they are receiving requests for drugs.
- Moving drugs and/or handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging' as outlined above.
- Being found in accommodation they have no connection with (often called a 'trap house' or 'cuckooing') or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiter.
- Having their bank account used to facilitate drug dealing.
- Relationships with controlling or older individuals or groups.
- Having been the victim or perpetrator of serious violence e.g. knife crime and/or evidence of physical injury or assault that cannot be explained.
- Carrying weapons.
- Sudden decline in school results.
- Becoming isolated from peers or social networks.
- Self-harm or significant changes in mental state.
- Parental reports of concern.

Further information on County Lines and Child Criminal Exploitation are contained in Annex A of Keeping Children Safe in Education 2026 and Chapter 2 of the RSCP child protection online procedures: Child Criminal Exploitation well as the Academy website and guidance published by the Home Office

CHILD SEXUAL EXPLOITATION (CSE)

Keeping Children Safe in Education (2026) defines CCE and CSE as follows: 'Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power

to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute Modern Slavery.'

The Academy recognises that CSE can occur over time or be a one-off occurrence or a series of incidents over time, ranging from opportunistic or complex organised abuse. CSE can be physical and/or take place online and can be perpetrated by individuals or groups, including organised networks, of all genders, by children and adults, and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media. Most sexual abuse is committed by those already or previously known to the victim.

The Academy recognises that CSE can affect any child who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes children aged 16 and above who can legally consent to sexual activity. The school will also recognise that children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. Whilst age may be the most obvious, the power imbalance described above can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

CSE can occur in all communities and amongst all social and ethnic groups and can affect girls and boys under the age of 18. Very young children can also be affected or targeted, particularly in relation to online concerns. CSE is a complex form of abuse and it can be difficult for those working with children to identify and assess. However, all those working in the Academy are made aware of the potential indicators of grooming and exploitation and how to refer concerns on appropriately, including liaising with the DSL and the Local Authority Children's Social Care. This is additionally important as victims may may be sanctioned and even criminalised for actions they take while under coercion if the exploitation isn't recognised.

Indicators of child sexual exploitation may include:

- Acquisition of unexplained gifts, money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Regular exclusion or unexplained absences from school, college or work, or not taking part in education.
- Leaving home/care or going missing without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.
- Misusing drugs or alcohol and/or returning home under the influence of drugs/alcohol.
- Displaying sexual behaviours beyond expected sexual development.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups – having older boyfriends or girlfriends.
- Association with other young people involved in exploitation.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours, and
- Self-harm or significant changes in emotional well-being.
- Suffering from sexually transmitted infections.
- Becoming pregnant.

More information on CSE is contained in Annex A of Keeping Children Safe in Education (2026), Child Sexual Exploitation: Definition and a guide for practitioners (DfE 2017), and Chapter 2 of the RSCP child protection online procedures: Child Sexual Exploitation

SERIOUS VIOLENCE

Serious violence may involve physical assault, including the carrying, threatening with or use of weapons. Staff will immediately raise a concern with the senior leadership team and/or the DSL if there is a concern that a child may be carrying or has used a weapon, or has expressed an intent to do so, or is involved in serious violent crime. This includes concerns raised about out-of-school activity. The level of risk will then be assessed and appropriate action taken; this will include a consideration of when children might be at highest risk during the school day.

All staff, through training, will be made aware of the indicators which may signal that a child is at risk from, or is involved with, serious violent crime and/or serious violence (including that linked to CCE and county lines and/or within the context of peer conflict or child-on-child abuse). These indicators include, but are not limited to, the following:

- Increased absence from school.
- A change in friendships.
- New relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- 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 or sexual exploitation (see above).

The most significant risk factors that could increase a student's vulnerability to becoming involved in serious violent crime are:

- Being male.
- Having been frequently absent and/or absent without explanation
- Regularly suspended or permanently excluded from school.
- Spending time in an alternative provision
- Having experienced child maltreatment.
- Having been involved, or having peers involved in antisocial behaviour, offending, such as theft or robbery, substance abuse.

The academy recognises the need for early intervention and support and will follow a graduated response in terms of securing targeted and/or therapeutic interventions for children who are deemed vulnerable to serious crime.

More information on the criminal exploitation of children and serious crime can be found in Annex A of Keeping Children Safe in Education (2026) and also in Chapter 2 of the RSCP procedures online: Gang Activity and Serious Youth Violence

CYBERCRIME

Cybercrime is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Children may experiment with illegal online activity without understanding the legal or ethical implications.

Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting' (for example overwhelming a computer or network with internet traffic from multiple sources to render it unavailable).
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. All staff will follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring students to the National Crime Agency's Cyber Choices programme. The Academy takes into account The Government's Cyber security standards for schools and colleges and regularly reviews the effectiveness of its security protection procedures in order to keep up with evolving cyber-crime technologies, strengthen resilience, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risk.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

FINANCIAL EXPLOITATION

Financial exploitation can take many forms. In the contact of children this may take the form of money laundering. Working Together to Safeguarding Children defines this as 'when criminals target children and adults and take advantage of an imbalance of power to coerce, control, manipulate or deceive them into facilitating the movement of illicit funds. This can include physical cash and/or payments through financial products. Such as bank and cryptocurrency accounts.' Children can be at risk of a type of online blackmail often referred to as 'sextortion' where young people and adults are blackmailed into paying money or meeting another financial demand (such as purchasing a pre-paid gift card) after an offender has threatened to release sexual/indecent images of them.

MODERN SLAVERY AND HUMAN TRAFFICKING

Modern Slavery is a form of organised crime in which individuals, including children and young people, are treated as commodities and exploited for criminal and financial gain. It encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation including. forced labour, slavery, servitude, and the removal of organs. Children and young people may not realise they are being exploited, particularly if this is being undertaken by parents, carers or family members.

The International Labour Office has identified four sets of operational indicators for adult and

child victims of trafficking for labour and sexual exploitation. Each set is a structured list of indicators relevant to the following dimensions of the trafficking definition:

- Deceptive recruitment (or deception during recruitment, transfer and transportation)
- Coercive recruitment (or coercion during recruitment, transfer and transportation)
- Recruitment by abuse of vulnerability
- Exploitative conditions of work
- Coercion at destination.

All staff will be aware of and alert to the signs that a child may be the victim of modern slavery and/or human trafficking which might include indicators outlined above for exploitation as well as:

- no evidence of parental permission for the child to travel to the UK or stay with the adult.
- little or no evidence of any pre-existing relationship with the adult or even an absence of any knowledge of the accompanying adult.
- evidence of unsatisfactory accommodation arranged in the UK.
- having no access to their parents or carers (although children may be living with their parents or carers and still be exploited).
- looking intimidated.
- behaving in a way that does not correspond with behaviour typical of children their age.
- having no friends of their own age.
- having no time for playing.
- living apart from other children and in substandard accommodation.
- eating apart from other members of the "family".
- being given only leftovers to eat.
- being engaged in work that is not suitable for children.
- travelling unaccompanied by adults or in groups with persons who are not relatives.
- having child-sized clothing typically worn for doing manual work or forced prostitution.
- having toys, beds and children's clothing in inappropriate places such as brothels and factories.
- claims made by an adult that he or she has "found" an unaccompanied child.
- unaccompanied children carrying telephone numbers for calling taxis.
- the discovery of cases involving illegal adoption.

Staff and the DSL will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

10.CHILDREN AT INCREASED RISK OF ABUSE, NEGLECT AND/OR EXPLOITATION

Some groups of children are at increased risk of abuse, neglect and/or exploitation both online and offline, either through emotional difficulties, communication difficulties or family circumstances. The Academy is particularly aware of these groups and specifically careful in ensuring they are safeguarded. Other children at increased risk of abuse, neglect and/or exploitation including additional safeguarding issues (both online and offline) are:

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND)

The Academy understands that children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse, neglect and/or exploitation in this group of children and young people. This can include:

- Assumptions that indicators of possible abuse, neglect and/or exploitation such as behaviour, mood and injury relate to the child or young person's disability without further exploration.
- Children and young people with SEND can be disproportionately impacted by behaviours such as bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.
- The need for greater dependency on adults for care including intimate care.
- Differences in cognitive understanding and being less able distinguish between fact and fiction that their peers, particularly in online content.
- Being additionally vulnerable to online risks including grooming and radicalisation.

Where there are any concerns raised about the safety and welfare of a child or young person with SEND in the Academy, we will ensure that these will be treated in the same way as with any other child or young person, with careful consideration of any additional needs and being cognisant of the above factors. When managing a safeguarding issue relating to a child with SEND, the DSL will liaise with the Academy's SENCO, as well as the child's parents where appropriate, to ensure that the child's needs are met effectively.

More information on children and young people with SEND is contained in Part 2 of Keeping Children Safe in Education 2026, the NSPCC document 'We have the right to be safe – Protecting disabled children from abuse' (Oct 14), the SEND Code of Practice 0-25 years and Chapter 2 of the RSCP child protection online procedures: Children with Disabilities/Complex Needs

CHILDREN WITH MEDICAL CONDITIONS

The Academy supports children with medical conditions in line with its Supporting Students with Medical Conditions and First Aid policy, and its Allergy and Anaphylaxis Policy. While having a medical condition does not in itself indicate a safeguarding need, incidents of a clinical nature may trigger a safeguarding duty and necessitate further action.

CHILDREN WITH A MENTAL HEALTH NEED

All staff 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. Staff understand that while only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, and they should not attempt to do this themselves, they are nonetheless well placed to observe children day-to-day and identify those students whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse, neglect and/or exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. The Academy recognises it is imperative that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and educational progress. The following key messages are understood by all staff:

- Behaviour is a form of communication.
- A relationship with an emotionally available adult is key; relationships are vital.
- Students need to feel safe in order to learn and thrive.

- Interaction can be an intervention.
- Staff wellbeing is essential as a priority to supporting others.

For children struggling with their mental health and/or self-harming, expressing suicidal thoughts and/or diagnosed with an eating disorder, the following indicators may be a cause for additional concern:

- 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 staff have a mental health concern about a child that is also a safeguarding concern, they will notify the DSL or Deputy DSL of their concerns without delay. If the child is felt to be in immediate danger the Academy will call 999 immediately or ensure they are taken to A&E without delay. If the concern is urgent but not an emergency then the Academy will call 111 for advice. For non-urgent concerns the Academy will take a graduated response to the child's needs and signpost them to a range of inhouse and/or external support, including early targeted support and/or specialist support.

Further information on children experiencing mental health issues can be found in the Department for Education document: Mental health and behaviour in schools - GOV.UK (www.gov.uk) and also chapters, , 2.1.11, 2.1.12, 2.1.13 2.1.14 and 2.1.15 of the RSCP child protection online procedures: Contents

CHILDREN WITH FREQUENT UNEXPLAINED ABSENCE AND/OR MISSING FROM EDUCATION (CME)

Knowing where children and young people are during school hours is an extremely important aspect of safeguarding. Being absent from school for prolonged periods and/or on repeat occasions, particularly without explanation, can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues including risk of being victims of harm, exploitation and/or radicalisation, county lines activity, FGM or forced marriage, mental health problems or substance misuse. While there are many circumstances where a child may be absent from education, some children are particularly at risk of harm or neglect and at risk of not only persistence absences, but also becoming missing. These include children who are:

- At risk of harm, neglect and/or exploitation.
- At risk of forced marriage or FGM.
- From Gypsy, Roma, or Traveller families.
- From the families of service personnel.
- Missing or run away from home or care.
- Supervised by the youth justice system.
- Cease to attend a school.
- From new migrant families.

All staff in the Academy understand the importance of regular attendance and our Academies have appropriate procedures to follow for unauthorised absence and for dealing with children that are absent from education, particularly on repeat occasions and/or when there is no explanation. This helps identify the risk of abuse, neglect, and/or exploitation and helps prevent the risks of their going missing from education in future. All staff are alert to indicators for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to

being absent or missing, such as travelling to conflict zones, FGM and forced marriage. If a staff member suspects that a child is suffering from harm or neglect and/or is absent from education, they will make the DSL aware of their concern immediately. Where concerns for children are already high and social care are involved, the DSL will inform the assigned social worker.

The Academy always follows up with parents/carers when children are not at school. This means the Academy requires at least TWO up to date contacts numbers for parents/carers. We strongly encourage parents/carers to update the Academy as soon as possible if the contact details change. The Academy informs the local authority of any child who fails to attend regularly or has been absent without the Academy's permission for a continuous period of 10 school days or more. Where children already have a social worker involved, the Academy makes daily contact with them when a child is absent. The Academy follows admission and transition procedures at outlined in the DfE Children missing Education Guidance 2016.

More information on children missing education is contained in Annex A of Keeping Children Safe in Education 2026 and Chapter 2.3.2 of the RSCP child protection online procedures:

Children Missing from Education and Children in Education...

Additional guidance on other safeguarding issues such as Substance Misuse, Domestic Abuse, Trafficking, Mental Health and many more is contained in Annex A of 'Keeping Children Safe in Education 2026' along with information about the indicators of abuse contained in Chapter 1.2.1. of the RSCP child protection online procedures: Recognising Abuse and Neglect

CHILDREN WHO ARE ELECTIVELY HOME EDUCATED (EHE)

Parents/carers may choose elective home education (EHE) for their children, many of whom may have an overwhelmingly positive experience. The Academy recognises that the decision to home educate is usually made with the child's best education needs at heart. However, for some children this may not be the case; EHE can mean that children are less visible to the services needed to safeguard and support them and some children may not receive a suitable education. In line with the Education (Student Registration) (England) Regulations 2006, the Academy will inform the Local Authority of all deletions from the admissions register when a student is taken off roll.

Where a parent/carer has expressed their intention to remove a child from the Academy for EHE, the Academy, in collaboration with the Local Authority and other key professionals, will coordinate a meeting with the parent/carer, where possible, before the final decision has been made, particularly if the child has SEND, is vulnerable, and/or has a social worker.

CHILDREN WHO ARE PRIVATELY FOSTERED

A private fostering arrangement is one that is made privately (without the involvement of a Local Authority) for the care of a child or young person under the age of 16 years (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant Local Authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. Where the school becomes aware of a student being privately fostered, they will notify the LA as soon as

possible to allow the LA to conduct any necessary checks. Further information on Private Fostering can be found in chapter 2.3.7 of the RSCP child protection online procedures: Safeguarding Children Subject to Private Fostering...

CHILDREN WITH A FAMILY MEMBER IN CUSTODY

Children with a family member in custody will be offered pastoral support as necessary. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

CHILDREN REQUIRED TO GIVE EVIDENCE IN COURT

Children required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Children will be provided with the age appropriate 'Going to Court' booklet from HMCTS (Her Majesty's Courts and Tribunal Service) where appropriate and allowed the opportunity to discuss questions and concerns:
5-11 years: Young witness booklet for 5 to 11 year olds - GOV.UK (www.gov.uk)
12-17 years: Young witness booklet for 12 to 17 year olds - GOV.UK (www.gov.uk)

CHILDREN IN CARE, OR PREVIOUSLY IN CARE (ALSO KNOWN AS LOOKED AFTER CHILDREN [LAC] AND PREVIOUSLY LOOKED AFTER CHILDREN [PLAC])

A child who is in care and looked after by a Local Authority (as defined in section 22 of the Children Act 1989) means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the Local Authority. Children are most commonly in care because of abuse and/or neglect. Because of this, they can be at potentially greater risk and vulnerability in relation to abuse, neglect and/or exploitation. Children previously in care, also known as care leavers, can also remain vulnerable after leaving care.

The DSL is provided with the necessary details of children's social workers and the Virtual School Head, and, for children previously in care, personal advisers. Every school is required to have a named Designated Teacher for LAC/PLAC who works closely with the Virtual School Team and the Local Authority. The Virtual School Head has a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of all students with a social worker and those living in kinship care arrangements.

The Designated Teacher for LAC/PLAC for the Academy can be found on the front of this policy. They work with the Virtual School to implement the Personal Education Plan (PEP) process for children in care, and to promote a whole Academy culture where the personalised learning needs of every child in care, and previously in care matters, is embedded and their personal, emotional and academic needs are prioritised. We recognise that, nationally, the educational achievement of children in care and previously in care as a group, remains unacceptably low and that gaps in their learning and/or emotional impact of their experiences may have formed barriers to progress. The Academy intends that children in care and previously in care make excellent educational progress which is overseen by governors.

Staff are given the skills, knowledge and understanding to keep children in care and previously in care safe and to promote their education outcomes. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the student.

CHILDREN WHO NEED A SOCIAL WORKER (CHILD IN NEED AND CHILD PROTECTION PLANS)

Children may need a social worker due to safeguarding or welfare needs. The Academy recognises 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 child has a social worker, the DSL will always consider this fact as a matter of routine to ensure any decisions are made in the best interests of the child'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.

There are clear powers to share this information under existing duties on both Local Authorities and schools and colleges to safeguard and promote the welfare of children.

The Academy is aware that when a child is assessed under Section 17 of the Children Act 1989, the local authority may appoint a qualified lead practitioner rather that a social worker.

Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

CHILDREN WHO IDENTIFY AS LGBTQ+

While the fact that children may identify as LGBTQ+ is not in itself a risk factor for harm, it has to be recognised that they can be targeted by other children, even if they are simply perceived to be LGBTQ+ (whether they are or not). It is therefore important that children identifying as LGBTQ+ have at least one trusted adult with whom they can be open. Staff should endeavour to remove any barriers they face and create a culture where they can speak out or share their concerns with a trusted adult. However, it is important that caution is exercised when children question their gender; the Cass Review (2024) identified many unknowns about the impact of social transitions and the likelihood of wider vulnerabilities including complex mental health needs and/or SEND. While the Academy will not initiate any action regarding social transition, the Academy will work closely with parents/carers when a child becomes gender questioning to consider the broad range of the child's needs, taking into account any clinical advice and risk of child-on-child abuse (including harassment and violence),, unless doing so would constitute a significant risk to the child.

The Academy will pay due regard to the Trust's guidance on gender questioning children which takes into account the guidance within Keeping Children Safe in Education. This means that while the Academy will work closely with the child and their parents/cares to manage requests for social transition, including use of names and pronouns, it will be made clear that access to toilets and

changing areas designated for the opposite sex will not be possible. However, there will be discussion about alternative facilities. Similarly, consideration will be given to health and safety where children and their parents/carers request they join PE lessons designated for the opposite sex. The Academy, while supporting requests for social transition is required to record a child's biological sex accurately and make staff aware of a child's biological sex, and be vigilant to any children who may have socially transitioned from an early age and be 'living in stealth,' so that their biological sex is not widely known. In these cases puberty might be additionally difficult and the DSL will be involved in these cases.

Just as children wishing to socially transition will be supported by the Academy, those children who wish to detransition will also be supported. Any agreements drawn up with a child and their parents/carers will be regularly reviewed.

CHILDREN WHO ARE YOUNG CARERS

The Academy is aware that some children undertake caring responsibilities which can impact on their wellbeing, behaviour, attendance and attainment. The Academy therefore aims to identify these children early to ensure they receive timely support both within the academy and/or from external services.

CHILDREN WHO ARE ATTENDING THE EARLY YEARS FOUNDATION STAGE (2-5 YEARS)

Safeguarding Principles outlined in Section 3 of the EYFS Statutory Framework 2026 are followed. The Academy is aware that key safeguarding principles for this age group include:

- Increased Vulnerability and Dependence: including limited communication skills which preclude them from disclosing abuse, neglect or exploitation.
- Early Identification of needs: this includes being vigilant to sighs of neglect and developmental delay
- Intimate Care and Physical Boundaries; for this age group intimate care may be a routine part of daily provision (for example, nappy changing) and required robust procedures, clear documentation and transparent communication with parents
- Rigorous staffing, supervision and training; this includes appropriate staff and supervision rations, and training needs pertinent to this age group (for example, paediatric first aid).
- Partnership with Parent/carers and external agencies; as well as close working with parents/carers, there is a need to maintain multi-agency relationships with professionals working with young children for example, health visitors.

11.PROCEDURES FOR MANAGING CONCERNS

The Academy adheres to child protection procedures that have been agreed locally through the new Safeguarding Partnership. The three local safeguarding partners that have established arrangements to work together with all appropriate agencies are:

- Local Authority.
- The Integrated Care Board.
- The Chief Police Officer.

It is not the responsibility of Academy staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy (see **Appendix 1/2/3** for further information on how to report concerns and manage disclosures).

The Designated Safeguarding Lead (DSL) must be used as a first point of contact for concerns and queries regarding any safeguarding concern in the Academy. Any member of staff or visitor to the Academy who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the Deputy DSL. In the absence of either of the above, the matter must be brought to the attention of the most senior member of staff.

If a child is in immediate danger or risk of harm, a referral must be made to the Local Authority Children's Social Care and/or the Police immediately. Anyone can make a referral but in situations where referrals are not made by the DSL, the DSL must be informed as soon as possible afterwards that a referral has been made by someone else.

All concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing using the agreed reporting procedure in the Academy/Trust e.g. CPOMS/safeguarding email or written form (see **Appendix 1**).

Following receipt of any information raising concern, the DSL will consider as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

All referrals will be made in line with the local authority multi-agency safeguarding arrangements – see Appendix 4 for contact details. For more information see the example outlined in RSCP procedures – 'Referring Safeguarding Concerns about Children' Referring Safeguarding Concerns about Children

If, after a referral, the child's situation does not appear to be improving, we will consider following the appropriate LSCP escalation procedures to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

Staff must always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with the Local Authority Children's Social Care, or the Police, if the situation is an emergency and the DSL, their deputy and the Principal, are all unavailable and they are convinced that a direct report is the only way to ensure the student's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Principal or the Chair of Governors. If any member of staff who does not feel the situation has been addressed appropriately at this point should contact the Local Authority Children's Social Care directly with their concerns.

If staff members have concerns about another staff member, including governors, volunteers, trainee teachers, supply teachers, external agency staff and contractors then this must be referred to the Principal, or the Designated Safeguarding Lead or Vice Principal who will liaise with the Principal.

Where there are concerns about the Principal this must be referred to the Chief Executive, Chair of Governors, or Trust Board who will consider whether a referral to the Local Authority Designated Officer (LADO) is indicated

Where there are concerns about the way that safeguarding is carried out in the Academy/Trust, staff should refer to the Place Partnership Whistleblowing Policy, which can be found on the Academy

website. All staff are required to read the Whistleblowing Policy and confirm they are able to put it into practice.

12.WORKING WITH PARENTS/CARERS

The Academy is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and young people, and to support them to understand our statutory responsibilities in this area. When new students join the Academy, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents/carers on request and is available on the Academy website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to the Local Authority Children's Social Care.

We are committed to working with parents/carers positively, openly and honestly. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect parents'/carers' rights to privacy and confidentiality and will not share sensitive information unless we have consent, or it is necessary to do so in order to safeguard a child from harm. Our responsibility is to promote the protection and welfare of all children and young people, and our aim is to achieve this in partnership with our parents/carers. We will seek to share with parents/carers any concerns we may have about their child unless to do so may place that child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the Academy has about a child will not prevent the DSL making a referral to the Local Authority Children's Social Care in those circumstances where it is appropriate to do so. In order to keep children and young people safe and provide appropriate care for them, the Academy requires parents/carers to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child or young person normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details – at least two in order to be able to make contact with a responsible adult should a concern arise i.e. illness, not being collected at the end of the school day, a child or young person going missing or a safeguarding concern.
- Full details of any other adult authorised by the parent/carer to collect the child or young person from school (if different from the above).

The Academy will retain this information on the student file. The Academy will only share information about students with adults who have parental responsibility for a student or where a parent/carer has given permission and the Academy has been supplied with the adult's full details in writing. The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

In the event of any complaints about safeguarding procedures in the Academy, the Complaints Procedures are accessible on the Academy website.

13.STAFF TRAINING AND POLICIES

All staff, including governors, will receive regular safeguarding and child protection training at induction and receive updates, including on September inset day as required, and at least annually to provide them with relevant skills and knowledge to safeguard children effectively, including an understanding of the expectations and responsibilities in relation to filtering and monitoring. The Place

Partnership Trust subscribes to an Online Learning Package and staff, including governors are directed to complete specific modules which include Safeguarding for Staff, Prevent Duty, Online Safety, Understanding Sexual Harassment and Sexual Violence, Data Protection and GDPR, Equality, Diversity and Inclusion, Fire Safety, Allergy and Anaphylaxis Awareness. The training is:

- Integrated, aligned and considered part of the whole school approach and wider staff training and curriculum planning.
- In line with advice from the 3 safeguarding partners.
- Has regard to the Teachers' Standards to support the expectations that all teachers.

    - Manage behaviour effectively to ensure a good and safe environment.
    - Have a clear understanding of the needs of all children.
    - Commit to training which includes Prevent to enable them to identify children at risk of radicalisation and being drawn into terrorism, and to challenge extremist ideas.

To underpin the values and ethos of our Academies, and our intent to ensure that students at our Academies are appropriately safeguarded, additional mandatory policies and guidance which fall under the umbrella of safeguarding can be found on Academy websites. These include, but are not limited to:

- Attendance Policy.
- Anti-Bullying Policy.
- Behaviour Policy.
- Educational Visits and Learning Beyond the Classroom Policy.
- Positive Handling Policy.
- RSHE Policy.
- SEND Policy.
- Visitor to the Academies Guidance.
- Equality and Diversity Policy.
- Safe Use of ICT Policy.
- Data Protection Policy.
- Online Policy.
- Protection of Biometrics Information Policy.
- Children with Health Needs Who Cannot Attend School Policy.
- Supporting Students with Medical Conditions and First Aid Policy.
- Toileting and Intimate Care Policy.
- Fire Policy.
- Health and Safety Policy.
- Complaints Policy.
- Whistleblowing Policy.
- Lettings Policy.

13.RECORDS AND INFORMATION SHARING

The Academy maintains detailed and effective child protection records by using the digital CPOMS system. If staff are concerned about the welfare or safety of any child or young person at the Academy, they will record their concern quickly via the safeguarding email address and/or use the CPOMS system with as great a degree of accuracy as possible. If they feel the concern is urgent, they must also seek to verbally inform the DSL or DDSL as soon as possible.

Any external paper information recorded will be scanned into the CPOMS system with the paper original being kept in a separate named file, together (where relevant) with any archived paper records. These are stored in a secure cabinet and not with the child or young person's academic file. These files will be the responsibility of the DSL.

Child protection information will only be shared within the Academy on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential. Child protection information will only be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here. Documents not scanned and uploaded to CPOMS will be secured in the safeguarding files. They will include minutes of CP meetings. All other documentation is stored on CPOMS.

ACADEMIES MAINTAINING THE CPOMS SYSTEM

Concerns alerted to safeguarding are recorded through the CPOMS system. This will automatically log the name and the time and date of referral. Staff can record information into the CPOMS system, and any referral must be made as soon as possible after a concern has been raised to maintain the record's validity. The Principal, Vice Principal, DSL and DDSL and essential pastoral staff have two factor authentication to enable them to access full safeguarding records kept digitally within the CPOMS system – these records are only accessed in closed offices and screen lock is used when necessary to maintain confidentiality.

Child protection information will only be kept on the CPOMS system and in no other place. In CPOMS schools, records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored in paper form or scanned digitally and added to CPOMS – under usual circumstances originals should be kept. Paper records from before the CPOMS system was instigated will be kept until a child reaches the age of 25.

14.SAFER RECRUITMENT & DBS CHECKS

RECRUITMENT AND SELECTION PROCESS

At all times, the Principal and Academy Education Committee will ensure that safer recruitment practices are followed in accordance with the requirements of Part Three of 'Keeping Children Safe in Education 2026'.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.

- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).
- Include a copy of, or link to, our Child Protection and Safeguarding Policy.
- Make clear the policy regarding the employment of ex-offenders.

Applicants will be asked to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether 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
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Consider carrying outa search (via an online search engine) on shortlisted candidates to help identify any incidents or issues that are publicly available online; candidates will be made aware that online searches may be undertaken as part of due diligence.
- Explore all potential concerns.

Seeking references and checking employment history

We will aim to obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at or after interview. When seeking references, we will:

- Not accept open references.
- Liaise directly with referees and verify any information contained within references with the referees, including where information is vague or insufficient.

- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Establish reasons for the candidate leaving their current or most recent post.
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- Find out what attracted the candidate to the post, their motivation for working with children and explore their relevant skills and experience ask candidates if they are known to the police and/or children's social care and if confirmed so, ask candidates to give details.
- Probe any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.

PRE-APPOINTMENT VETTING CHECKS

We will record all information on the checks carried out in the school's Single Central Record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK, including those previously living outside the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.

- Ensure they are not subject to a prohibition order if they have teaching responsibilities.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these could include:

    - For all staff, including teaching positions: criminal records checks for overseas applicants.
    - For teaching positions: obtaining a letter confirming they have not imposed any sanctions or restrictions, and/or are aware of any reason why that person may be unsuitable to teach from the professional regulating authority in the country where the applicant has worked.

- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state (Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers).

Where staff are working with children aged under 8 years, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Staff are required to inform the Principal if there is a change in their circumstances which would impact on a DBS check, for example if they receive a criminal conviction.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks, including DBS, that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made, including photo ID. Further information on visitors, including the different types of visitors and level of checks needed, can be found on the Visitors to School Guidance which is provided to staff and made available on the Academy website.

Contractors

- We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS and safer recruitment check (this includes contractors who are provided through a PFI or similar contract). This will be:
- An enhanced DBS check with barred list information for contractors engaging in regulated activity.
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors and undertake other safer recruitment checks; contractors would not normally be approved to work unsupervised during school hours. We will not keep copies of such checks for longer than 6 months. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

Changes to the Crime and Policing Act 2026 means that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children frequently, or on more than 3 days in a 30-day period or overnight, is now in regulated activity.

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.

- Obtain an enhanced DBS check with barred list information and undertake safer recruitment checks in line with regular staff for all volunteers who are new to working in regulated activity prior to them starting work in the Academy.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Schools with students aged under 8 will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Local Governors, Trustees and Members

All Local Governors, Trustees and Members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity along with full safer recruitment checks in line with regular staff. The chair of the board will have their DBS check countersigned by the secretary of state. All proprietors, trustees, local governors and members will also have the following checks:

A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]

- Identity.
- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

Staff working in alternative provision settings

Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. The Academy continues to be responsible for the safeguarding of the student while they are at the alternative provision and must therefore be satisfied that the setting meets the student's needs. This includes a requirement that the alternative provision provider informs the Academy of staffing changes, and that safeguarding checks have been undertaken. The Academy will also conduct regular reviews and visits to all alternative provisions to ensure it is safe and that the student is in regular attendance. The Academy is required to know where students are at all times during school hours and will hold the addresses of all alternative providers on file, including any satellite sites they may use. If an alternative provision provider gives cause for concern in terms of safeguarding, The Academy will immediately undertake and review and terminate the contract if necessary.

Adults who supervise children on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Children staying with host families

Where the school makes arrangements for children to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people. Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Use of the school premises for non-school activities

Where the Academy Education Committee hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep children safe, including assurances that there is no contravention of the Prevent Duty (as outlined in the Letting Policy which is published on the Academy Website).

Where the Academy Education Committee provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Academy Education Committee will seek assurance that the body concerned has appropriate Safeguarding and Child Protection policies and procedures in place, including inspecting these as needed. The Academy Education Committee will also ensure that there are arrangements in place to liaise with the Academy on these matters where appropriate. The Academy Education Committee will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement. It will be expected that any provider is compliant with Keeping Children Safe in out of school settings. Where the Academy receives an allegation against a member of staff using the premises to run activities for children it will follow the Academy safeguarding procedures and processes for managing allegations, including referral to LADO as necessary.

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the Academy to effectively safeguard students and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of children. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to Children's Social Care or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Transporting Students

In general, staff will not transport pupils in their own vehicles. If it is necessary, i.e., an emergency situation or part of an agreed role, it will be agreed and recorded and that staff must have business insurance, ensure the pupil is in the back seat wearing a seatbelt and that the Headteacher or DSL is informed of the situation and parents are informed and agree to the situation, including departure and estimated arrival times. A second member of staff should also be in attendance.

15.STAFF CONDUCT AND THE USE OF 'REASONABLE FORCE'

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children and young people. There are circumstances, however, when it is appropriate for staff in our Academies to use 'reasonable force' to safeguard children and young people.

'Reasonable Force' covers the broad range of actions used by our staff that involves a degree of physical contact to control or restrain children and young people. 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 child or young person needs to be restrained to prevent violence or injury. Staff in the Academy will be trained in how to use reasonable force and will understanding that 'reasonable' means 'using no more force than is necessary for the least amount of time,' and a list of those who have been trained in a recognised restrictive intervention response will be kept by the Principal. Careful consideration will always be given when using reasonable force, but particularly where incidents involve children with SEND, mental health problems and/or medical conditions.

Further guidance is outlined in the Positive Handling and Reasonable Restraint Policy which can be accessed on the Academy website.

16.SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, (INCLUDING SUPPLY TEACHERS), VOLUNTEERS AND CONTRACTORS

When managing allegations against staff, the Academy recognises the distinction between allegations that meet the harms threshold (and require managing in line with statutory guidance including referral to the local authority designated officer) and allegations that do not, also known as 'low-level concerns, (which are recorded and managed in line with internal procedures)' These distinctions are summarised below:

Spectrum of behaviour

Concern or allegation that may meet harm threshold

Behaviour which indicates that an adult who works with children has:

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

Low-level concern

Does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working with children may have acted in a way that:

- is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold, or is otherwise not serious enough to merit a referral to the LADO.

Appropriate conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

CONCERNS OR ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD

This section is based on 'Section 1: Concerns or allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school (transferable risk).
- Harassment, including sexual harassment in the workplace. These behaviours include unwanted physical content, inappropriate jokes or comments, sharing sexually explicit images or materials and or making unwelcome sexual advances or requests for sexual favours

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. A 'case manager' will lead any investigation. This will be the Principal, or the chair of governors/Executive Leader where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement. However, if there is any doubt as to whether a concern meets the harm threshold, the Academy will consult with the local authority designated officer (LADO).

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the Academy so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the Academy so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.
- Temporarily redeploying the individual to another role in a different location, for example to an alternative Academy within Place Partnership Trust or other work for the local authority.

If in doubt, the case manager will seek views from the school's HR Officer and the designated officer at the local authority, as well as the Police and the Local Authority Children's Social Care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation.

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.

False: there is sufficient evidence to disprove the allegation.

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the Local Authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the Police and/or the Local Authority Children's Social Care services. (The case manager may, on occasion, consider it necessary to involve the Police before consulting the designated officer – for example, if the accused individual is deemed

to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the Police).

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the Police or the Local Authority Children's Social Care services, where necessary). Where the Police and/or the Local Authority Children's Social Care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, Police and/or the Local Authority Children's Social Care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to the Local Authority Children's Social Care.
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the Police and/or the Local Authority Children's Social Care services as appropriate provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. In the Place Partnership Trust this would normally be an HR Officer, but an offer of counselling from MAST, Place Partnership Trust's inhouse mental health provision, would be made if deemed appropriate. Signposting to other services including the Education Support Partnership and GP would also be undertaken.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with the Local Authority Children's Social Care services and/or the Police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

Additional considerations for supply teachers, trainee teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teachers, trainee teachers or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures:

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The Academy Education Committee will discuss with the agency whether it is appropriate to suspend the individual or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary and will invite the agency's HR manager or equivalent to meetings as appropriate.

The above expectations will also apply to trainee teachers placed within the Academy, including liaison with their teacher training providers.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Following a criminal investigation or prosecution, the case manager will discuss with the Local Authority's Designated Officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the Police and/or the Local Authority Children's Social Care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the

individual from teaching. The Academy will continue to have regard to its duties under the Public Sector Equality Duty (PSED)

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to the Local Authority Children's Social Care may be appropriate.
- Shown to be deliberately invented, or malicious, the Academy will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to the Local Authority Children's Social Care may be appropriate.
- Shown to be deliberately invented, or malicious, the Academy will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, Police and the Local Authority Children's Social Care, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with the Local Authority Children's Social Care or the Police as appropriate. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

1. Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
2. Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the Local Authority's Designated Officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

CONCERNS THAT DO NOT MEET THE HARM THRESHOLD (OR LOW-LEVEL CONCERNS)

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above. Concerns may arise through, for example:

- Suspicion.
- Complaint.
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent/carer or other adult within or outside the school.
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children. This enables us to:

- Identify inappropriate, problematic or concerning behaviour early
- Minimise the risk of abuse
- Ensure all adults working in the school are clear about, and maintain professional boundaries

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the Academy may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children; this includes inappropriate jokes, language or gestures.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

The Academy promotes an open culture through staff training (for example on inset days) where staff are educated about the importance of referring concerns, including self-referral, where staff

may find themselves in a situation which could be misinterpreted, may appear compromising to others or where behaviour potentially falls below the expected professional standards.

Responding to low-level concerns

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously.
- To the individual involved and any witnesses.

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the Academy's code of conduct. The Principal may consult with the DSL to take a more collaborative decision-making approach.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the Designated Officer at the Local Authority.
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

1. The concern (or group of concerns) has met the threshold for referral to the Designated Officer at the Local Authority and is found to be substantiated; and/or
2. The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

17.LEGAL FRAMEWORK

This policy has been devised in accordance with the following legislation and statutory guidance:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003

- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- The Data (Use and Access) Act 2025
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- The Rehabilitation of Offenders Act 1974
- Equality Act 2010
- The Human Rights Act 1998
- The Public Sector Equality Duty (PSED)
- Police and Criminal Evidence Act (PACE)1984 (Amended 2023) Code C
- Crime and Policing Act 2026
-

Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Multi-agency statutory guidance for dealing with forced marriage and multiagency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2023) 'Prevent Duty Guidance'
- HM Government (2025) 'Channel Duty Guidance: Protecting people susceptible to radicalisation
- DfE (2024) 'Behaviour in Schools'
- DfE (2026) 'Keeping children safe in education 2026'
- DfE (2026) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Working Together to Improve School Attendance'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2025) 'Generative AI: product safety expectations'
- DfE (2026) 'Meeting digital and technology standards in schools and colleges'

APPENDIX 1: WHAT TO DO IF YOU SUSPECT OR ARE INFORMED OF A CHILD PROTECTION ISSUE OR HAVE A CONCERN

- Recognise that you have a duty of care to alert the safeguarding team of your concern. Always act in the interest of the child or young person.
- Do not take responsibility to investigate the welfare concerns or determine the outcome at this stage.
- You must collate and immediately pass on any information; provide details of your concerns by contacting the safeguarding team on the designated email address and/or through the CPOMS system. Never assume this has already been done by another colleague or professional.
- If a child or young person is in immediate danger or at risk of harm, including not being safe to go home, contact the DSL or DDSL IMMEDIATELY so an urgent referral can be undertaken to the Local Authority Children's Social Care and/or the Police.
- Anyone can make a referral to social care; in the unlikely event of the DSL, DDSL Vice Principal or Principal not being available and you feel the concern is urgent you must make a referral to the appropriate Local Authority Children's Social Care service:

    - **Rotherham** Multi-Agency Safeguarding Hub (MASH): 01709 336080
    - City of Doncaster Council Children's Services – Social Care and Safeguarding: 01302 737777 (evening or weekends 01302 796000)
    - Wakefield Multi-Agency Safeguarding Hub (MASH) 0345 8503503

AND/OR

- Police: 999

- Inform the DSL as soon as possible afterwards in this circumstance.

Any logged concern will:

- Be accessed by the safeguarding team
- Generate a response from the Safeguarding team. The alert will be investigated and triaged in accordance with the nature of the concern.
- The safeguarding team is trained to recognise thresholds of child protection and necessary intervention.
- Be stored securely in CPOMS. The entry is the responsibility of the DSL.
- The member of staff who alerted the safeguarding email system/CPOMS system will receive an email acknowledgment that action has been taken.

The DSL or DDSL will determine a course of action, including a consideration as to whether Early Help is appropriate, and at which level, or whether the concern requires a referral to the Local Authority Children's Social Care. The Local Authority should then make a decision within 1 working day of a referral about what course of action is being taken and inform the DSL (or person who made the referral). This will include a decision about whether the child needs:

- immediate protection and urgent action are needed
- intervention for them and/or their families from other services

- to be assessed under Section 17 of the Children Act 1989
- to be assessed under Section 47 of the Children Act 1989 because there is reasonable cause to suspect that they are suffering or likely to suffer significant harm
- Further specialist assessments are required to inform further action.

If this information is not made available, then the DSL should follow this up. If the child's situation does not seem to be improving after the referral, the DSL or person making the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improved. This can be done by requesting to speak to a manager within the Local Authority Children's Social Care Team. The DSL will at every stage of the process ensure that the case is kept under constant review and all information recorded on the Academy's CPOMS system.

Where there are concerns about the way that safeguarding is carried out in the Academy/Trust, staff should refer to the Place Partnership Whistleblowing Policy, which can be found on the Academy website. All staff are required to read the Whistleblowing Policy and confirm they are able to put it into practice.

APPENDIX 2: WHAT TO DO IF A CHILD MAKES A DISCLOSURE

If a child or young person makes or wishes to make a disclosure of a safeguarding nature to you:

- Do not put the moment off.
- You may need to find a place away from others (ensure this is appropriate).
- Listen to them and believe them.
- Find someone to assist in communication if necessary.
- Keep calm and do not show that you are shocked or upset.
- Guard against negative body language.
- Don't judge.
- Respond briefly, slowly and gently.
- Do not ask leading questions.
- Reassure the child they have done the right thing in telling you and that there is no reason for them to feel ashamed (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.
- Do not assume that there is only one child or young person involved.
- Do not act in any way which may give the child reason to believe they have caused a problem by reporting to you.

Ensure that you:

- Record what you have heard/observed.
- Make notes as soon as possible.
- Use child or young person's words wherever possible.
- Include what you have said to the child or young person.
- Keep information factual; do not put your own judgement on it
- Include what led up to the disclosure.
- Date, time, place, who was present.
- Log concern via CPOMS, safeguarding email or by completing the Academy's Confidential Safeguarding Incident Slip.
- At this point do not discuss with anyone other than to the DSL or DDSL immediately or any other relevant authority involved.

APPENDIX 3: WHEN TO MAKE A REFERRAL TO THE LOCAL AUTHORITY CHILDREN'S SOCIAL CARE

For information about thresholds, see Rotherham, Doncaster or Wakefield Multi-Agency Continuum of Need Guidance and Multi-Agency Threshold Descriptors. Each safeguarding partnership also provides information about specific safeguarding concerns; for ease of reference the Rotherham procedures are cited below. Links to Rotherham, Doncaster and West Yorkshire manuals are referenced in Appendix 4.

A referral should be made to Local Authority Children's Social Care when:

- A child or young person makes a clear allegation of abuse, neglect and/or exploitation.
- A child has been abandoned.
- Further concerns have arisen in relation to an open case to Children's Social Care.
- Concerns of significant harm have risen for a child receiving a service as a Child in Need.
- Further concerns have arisen of increased or additional risk to a child currently subject to a Child Protection Plan.
- A child sustains an injury and there is professional concern about how it was caused.
- There are any circumstances which suggest that a child is suffering or is likely to suffer Significant Harm.
- An unborn child may be at risk of significant harm – for more information see RSCP Child Protection procedures - Safeguarding Unborn and Newborn Babies and Concealment and Denial of Pregnancy.
- A non-mobile infant sustains any injury - the presence of any bruising, of any size, in any site should initiate a detailed examination and inquiry into its explanation, origin, characteristics and history, and the child should then be referred to Local Authority Children's Social Care.
- A baby or child or young person is not meeting appropriate developmental milestones or they appear to have faltering growth – for more information see RSCP Child Protection procedures - Safeguarding Children at Risk Due to Faltering Growth.
- A member of the public makes an allegation that someone has abused, neglected and/or exploited a child.
- Professional concern exists about abuse, neglect and/or exploitation, despite no allegation being made.
- A child has been made the subject of an Emergency Protection Order or a Police Protection Order.
- Concerns have arisen for a child who is the subject of a Supervision Order or Care Order.
- Despite professional intervention, either on a single agency basis or as part of a universal or targeted early help intervention, because of suspected neglect, abuse and/or exploitation there is concern that a child is suffering or is likely to suffer significant harm or requires additional support – see RSCP Child Protection procedures - Practice Guidance: Significant Harm - The Impact of Abuse and Neglect for more information.
- There are concerns that a child or young person is being sexually exploited - for more information see RSCP Child protection procedures - Safeguarding Children At Risk: Child Sexual Exploitation
- A child is reported missing from home or care and there are additional concerns about their vulnerability – for more information see Safeguarding Children and Young People who go Missing from Home and Care.
- There are concerns a child may be harmed because of use of technology or social media – for more information see RSCP Child Protection procedure – Online Safety
- Concern exists about a child having contact with a person who may pose a risk, or potential risk, to children (see RSCP Child Protection procedure - Persons who Pose a Risk to Children Procedure.

- A child is being denied access to urgent or important Medical Assessment or services.
- There are suspicions that a child might be harmed because of fabricated or induced illness (see RSCP Child Protection procedures - Management and Safeguarding Children Where there are Perplexing Presentations (including Fabricated and Induced Illness)
- A child is at risk of being subjected to illegal procedures, for example, see RSCP Child Protection procedures:

    - Safeguarding Girls and Young Women at Risk of Abuse through Female Genital Mutilation or Breast Ironing Procedure
    - Safeguarding Children and Young People from Forced Marriage Procedure
    - Safeguarding Children and Young People from Honour or Faith-Based Abuse Procedure

- There are grounds for concern that a person may be a victim of human trafficking (see Safeguarding Children who may have been Trafficked from Abroad Procedure and National Referral Mechanism: guidance for child first responders (Home Office, August 2013)).
- A child is at risk or susceptible to being drawn into terrorism - for more information see RSCP Child Protection procedures – Radicalisation, Terrorist and Extremist ideology
- A child is at risk of being harmed through experiencing or seeing or hearing the ill-treatment of another, e.g. through Domestic Abuse (see RSCP Child Protection procedure Safeguarding Children at Risk because of Domestic Abuse Procedure).
- A child is at risk of being harmed because of concerns about their parents'/carers' mental health see RSCP Child Protection procedures Safeguarding Children at Risk where a Parent has Mental Health Problem Procedure.
- Either an adult or a child makes allegations of non-recent abuse, for more information see – RSCP Child Protection procedures: Safeguarding Children and Young People Involved in Organised or Multiple Abuse, and other Complex Investigations Procedures.
- A child has harmed another child (which may be a single event or a range of ill treatment), which is generally referred to as 'child on child abuse' see RSCP Child Protection procedures - Abuse by Children and Young People

APPENDIX 4 - USEFUL CONTACT NUMBERS AND E-MAIL ADDRESSES/WEBSITES:

Local Authority Children's Social Care (for all referrals, advice and support including referral to Early Help services):

- Rotherham Multi-Agency Safeguarding Hub (MASH) 01709 336080
- City of Doncaster Council Children's Services - Social Care and Safeguarding (including Early Help): 01302 737777
- Wakefield Multi-Agency Safeguarding Hub (MASH) 0345 8503503

Police/NHS emergency Number: 999

Police non-emergency number:101

NHS non-emergency medical advice: 111

Rotherham Safeguarding Children's Partnership: Contents

Doncaster Safeguarding Children Partnership Online Procedures: Policies & Procedures

West Yorkshire Consortium Inter Agency Safeguarding and Child Protection Procedures: Policies & Procedures

NPCC When to Call the Police: when-to-call-the-police--guidance-for-schools-and-colleges.pdf (npcc.police.uk)

NSPCC Helpline (for adults concerned about a child): 0808 8005000 or https://www.nspcc.org.uk/about-us/our-services/nspcc-helpline/

CEOP: www.ceop.police.uk

Internet Matters: https://www.internetmatters.org/?gclid=CIm4ldHXl8wCFYdAGwodwhEM5g

Educate Against Hate: Educate Against Hate - Prevent Radicalisation & Extremism

CSA Centre of Expertise on Child Sexual Abuse: Supporting practice in tackling child sexual abuse - CSA Centre

APPENDIX 5: CONTEXTUAL SAFEGUARDING: LOCAL RISK ASSESSMENT

Academy Name	Horbury Academy		
Completed by	Mrs R Paul	Date	September 2026

Keeping Children Safe in Education 2026 states: 'All staff should …. consider whether children are at risk of abuse or exploitation in situations outside their families' (Part One; paragraphs 20, p12)

It is known that incidents which occur out of school (including online) can influence relationships and behaviours between students within the learning environment. Staff accordingly have due regard for both the Child Protection and Safeguarding Policy as well as other policies and guidance relating to Safeguarding, for example Behaviour Policy, Anti-Bullying Policy, Whistleblowing Policy and RSHE Policy. Staff in the Academy are particularly vigilant to the school geography and have due regard for any areas which can be beyond easy sightline. Mobile devices are banned from use on the Academy site which minimises the potential for online activity in the community being continued within the learning environment. Students attending the Academy are provided with a range of learning opportunities through the curriculum and within tutor time/assemblies regarding contextual safeguarding risks within the community, including online safety, grooming and exploitation.

The Academy has developed a risk assessment in respect of local safeguarding risks which is regularly reviewed:

Community/Social risks	**Known/Potential risk**	**Control measures**
Child Criminal exploitation (CCE) and Child Sexual exploitation (CSE)	Known	Use of the PSHE curriculum to raise awareness for what makes a healthy relationship. Exploration of coercive control and how to seek support both in school and in the local community.

Online Harm, including sharing of nudes and semi-nudes	Known	Educating young people through our curriculum to raise awareness of risks posed by some members of society. Use of Safer Schools Police Officer to deliver key messages in age-appropriate assemblies. Our SSPO also delivers both group and 1:1 intervention to those who may at risk. Use of our Empower program to mitigate risks to females. Referrals to Police and Social Care for those requiring further support. This may lead to a RAM worker being issued to the pupil. If this is the case, a DSL will attend the RAM meetings to ensure we are kept abreast of the impact of the support being given. Use of the PSHE curriculum to educate all pupils as to the risks posed online. This includes KCSIE's 4C's – Content, Commerce, Contact and Conduct. Year Group assemblies delivered by the Senior DSL to promote online safety. Promotion of online safety weeks throughout the academic year. Resources shared on website for parents/carers on subject of online safety. Supporting success evenings used to signpost parents/carers to online safety support, including parental controls. Use of intervention to educate pupils on online risks.

Water safety	Known	Year group assemblies delivered prior to May half term (a known week for incidents) around water safety. Drowning prevention week promoted via form time and assemblies (resources used from Pol-Ed and assembly delivered by either the Senior DSL or the Safer School's Police Officer) Small group intervention with West Yorkshire Fire Service to further educate pupils at greater risk. Use of social and internal media to promote the water safety code.

Geographical risks	**Known/Potential risk**	**Control measures**
County Lines Child Criminal exploitation (CCE) and Child Sexual exploitation (CSE)	Known Known	Use of the PSHE curriculum to raise awareness of what makes a healthy, non coercive relationship. Exploration of the term "grooming" in the KS4 PSHE curriculum. Teaching staff educate around the topic of coercive control when the opportunity arises in a lesson. Use of inclusion meeting to discuss and support those at risk. Liaison with Social Care and the Police for gaining further support for pupils specifically at risk. Assemblies delivered by the Safer School's Police Officer about keeping safe in our community and how to report concerns.