Safeguarding & child protection policy

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1 Definitions

Safeguarding and promoting the welfare of children means:

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

All staff are made aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): both CCE and CSE are forms of abuse that occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in a criminal or sexual activity. It may involve an exchange or something the victim needs or wants, and/or for the financial advantage or increased status or the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE 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.

Staff will also be made aware and receive training to recognise signs of other safeguarding issues that can put children at risk of harm (included in **Part 1 of Keeping Children Safe in Education**).

2 Executive summary

This policy applies to all employees and associated governors, including volunteers.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child. To this end, our policy has, at its heart, the following key principles:

1. Prevention (creating and maintaining a climate of openness and trust for our children and staff)
2. Protection (through clear, unambiguous procedures and training)
3. Support (for all those who might have or have been subject to abuse, neglect or exploitation)
4. Close, robust working with parents and other agencies
5. The recognition that 'education' should be regarded as the fourth safeguarding partner. In accordance with the 'Working Together to Safeguard Children' (2023) we recognise the role of schools in providing effective safeguarding
6. We will conduct an annual review of our safeguarding protocols and policy.

In creating this policy, detailed attention has been given to the following key publications:

1. KCSIE – statutory guidance for academies and colleges (DfE 2025)
2. Working together to safeguard children (2023)
3. Early years foundation stage statutory framework (2025)
4. Information sharing – advice for practitioners providing safeguarding services for children, young people, parents and carers (DfE May 2024)
5. Working together to improve school attendance (2024)
6. Children missing education (2024)
7. Academy trust handbook (2025)
8. Channel duty guidance, protecting people susceptible to radicalisation (HM Government 2023)
9. Child sexual exploitation: definition and a guide for practitioners (DfE Feb 2017)
10. Children and Social Work Act (2017)
11. Education inspection framework (Ofsted)
12. Disqualification under the Childcare Act 2006. Statutory guidance for local authorities, maintained schools, Academies and Free Schools (DfE August 2018)
13. Safeguarding concerns: guidance for inspectors (Ofsted, September 2021)
14. Prevent duty guidance for England and Wales (HM government 2024)
15. What to do if you're worried a child is being abused: advice for practitioners (DfE, March 2015)
16. Children Act (1989) (and 2004 amendment), which provides a framework for the care and protection of children
17. Meeting digital and technology standards in schools and colleges (DfE, 2022 updated 2025)
18. Academy policies, namely; safer recruitment, behaviour, attendance, code of conduct, whistleblowing, online safety & SEND.

This policy also makes reference to:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

This policy is aligned with guidance issued by the Derbyshire Local Safeguarding Partnership arrangements and also complies with our funding agreement and articles of association.

3 Academy commitment

Safeguarding arrangements are underpinned by some key principles:

- Governors, the Senior Leadership Team, Heads of Subject, teachers, operational support staff and volunteers are committed to the belief that safeguarding is "everyone's responsibility" and that we all take personal responsibility for our role in systems that safeguard and promote the well-being of our students and all other children.
- We will be vigilant to the possibility that **"it could happen here"**, exercise professional curiosity when we identify possible concerns, share information appropriately and take decisive and timely action.
- When concerned about the safety or well-being of a child, we will always act in the **best interests** of the child.

We adopt a child centred and co-ordinated approach to safeguarding. Staff encourage children and parents to talk about any concerns and actively seek to promote the academy as a safe place to talk and seek support when there are difficulties. Children's worries and fears will be taken seriously, and children are encouraged to seek help from members of staff. We will ensure that all parents/carers are made aware of our responsibilities with regard to safeguarding procedures and how we will safeguard and promote the welfare of their children through our publication of this policy on our website.

4 Key areas of safeguarding

Duties and responsibilities as set out within the Education Act 2002 sec 175 and 157, DfE revised Statutory Guidance KCSIE 2025 and HM Working Together to Safeguard Children (2023) are incorporated into this policy.

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2

Safeguarding is not just about protecting children from deliberate harm. It also relates to broader aspects of care and education including:

- children's health and safety and well-being, including their mental health
- meeting the needs of children with special educational needs and/or disabilities
- the use of reasonable force
- meeting the needs of children with medical conditions
- safer eating procedures in relation to the EYFS statutory framework
- providing first aid
- educational visits
- intimate care and emotional wellbeing
- online safety and associated issues
- appropriate arrangements to ensure Academy security, taking into account the local context

Safeguarding can involve a range of potential issues such as:

- child abduction and community safety incidents
- neglect, physical abuse, sexual abuse and emotional abuse
- children missing from education & children absent from education
- sexual violence and sexual harassment between children in schools
- bullying, including online bullying (by text message, on social networking sites, etc.) and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender based violence/violence against women and girls
- extremist behaviour and/or radicalisation, The Prevent Duty, Channel
- child criminal exploitation (CCE) and child sexual exploitation (CSE)
- county lines
- children and the court system
- children with family members in prison
- serious violence
- so-called honour-based abuse including female genital mutilation (FGM) and forced marriage
- modern slavery
- risks linked to using technology and social media, including cybercrime online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content through consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.
- Domestic abuse
- Homelessness
- Mental health
- teenage relationship abuse
- substance misuse
- issues which may be specific to a local area or population, for example gang activity and youth violence
- other issues not listed here but that pose a risk to children

5 Safeguarding roles and responsibilities

This policy applies to all staff, governors, supply staff, contractors and visitors. Safeguarding arrangements will also apply during off site visits and trips, for students on Alternative Provision and where the school premises are used by an individual or organisation for the purposes of running activities (eg community groups, sports associations or service providers that run extra-curricular activities). In this event, the academy will seek assurance that the body concerned meets the guidance for "out of school" settings
Out-of-school settings: safeguarding guidance for providers - GOV.UK

We will follow the procedures set out by local safeguarding arrangements and Teaching Regulation Agency (TRA) and take account of guidance issued by the DfE in KCSIE 2025 to:

- ensure the DSL and Deputy DSL have received appropriate training and support for their role
- ensure there is a designated teacher for 'looked after children'
- ensure there is a link governor to the DSL responsible for safeguarding
- ensure there is a senior mental health lead that is a member of or supported by the senior leadership team
- ensure that every member of staff (including temporary, supply staff, volunteers, contractors & Governors) know the name of the DSL and the Deputy DSL
- ensure that every member of staff and all volunteers understand their responsibilities in being alert to the signs of abuse, neglect and exploitation and the responsibility for referring any concerns to the DSL/wider safeguarding team or to children's social care/police if a child is in immediate danger
- ensure that every member of staff is aware that safeguarding incidents and/or behaviours can be associated with factors outside the Academy and the signs to look for in this
- ensure that every member of staff is aware of the process for making referrals to Children's Social Care and for statutory assessment that may follow a referral. Where children's social care assessments take into consideration children being harmed in contexts outside the home it is important that staff provide as much information as possible as part of the referral process
- ensure that every member of staff is aware of the early help process and understand their role in it
- ensure that there is a whistleblowing policy and culture where staff can raise concerns about unsafe practice and that these concerns will be taken seriously
- ensure that there is a complaints procedure in place for children and families
- ensure that parents have an understanding of the responsibility placed on the Academy and the staff for safeguarding through publication of this policy
- notify Children's Social Care if there is an unexplained absence of at least five days of a student who is deemed vulnerable
- develop effective links with relevant agencies and cooperate as required with their enquiries regarding safeguarding matters, including attendance at child protection conferences
- keep online records of concerns about children, even where there is no need to refer the matter immediately; documenting and collating information on individual children to support early identification, referral and actions to safeguard and ensure all records are kept securely; separate from the main student file
- ensure that we follow robust processes to respond when children are missing from education or missing from home or care
- develop and then follow procedures where an allegation is made against a member of staff, supply staff, volunteer, contractor, governor or individuals from organisations hiring school premises
- ensure there is a safer recruitment policy in place and practices are always followed
- instigate an escalation process if there is any concern about the actions or inaction of social care staff or staff from other agencies

All adults working with or on behalf of children have a responsibility to safeguard and promote the welfare of children. There are, however, key people within the academy who have specific responsibilities. These are the key staff members that all incidents are reported to:

Role	Name	Contact Details
Link Governor responsible for Safeguarding	Claire Gotteri	c.gotteri@palterton.org.uk
Designated Safeguarding Lead (DSL)	Rosalind Horsley	r.horsley@palterton.org.uk
Deputy Designated Safeguarding Lead (Deputy DSL)	Elizabeth Dyson	e.dyson@palterton.org.uk
PREVENT Lead	Rosalind Horsley	r.horsley@palterton.org.uk
Designated Teacher for Looked After Children	Rosalind Horsley	r.horsley@palterton.org.uk
Senior mental health lead	Leanne Collins	l.collins@palterton.org.uk
LADO Allegations	Miles Dent	01629 531299 Professional.allegations@derbyshire.gov.uk
Childrens Social Care/Early Help Assessment	Rosalind Horsley	r.horsley@palterton.org.uk

The role of the headteacher

The Headteacher will:

- ensure there is a member of the Governing Body to take leadership responsibility for safeguarding and champion safeguarding issues
- appoint a DSL from the Leadership Team to take lead responsibility for safeguarding and a designated teacher for Looked After Children, who is appropriately trained
- undertake appropriate training to carry out their safeguarding responsibilities effectively and keep this up to date. They will also ensure that staff & governors receive safeguarding training suitable to their roles
- ensure sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children
- ensure the child's safety and welfare is addressed through the curriculum in line with Department for Education requirements
- liaise with the LADO where there are concerns about a staff member

The Headteacher delegates responsibility to the DSL to ensure that:

- the policies and procedures are fully implemented, and followed by all staff
- students are safe, feel safe and contribute to the wider safeguarding of each other
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies
- there are mechanisms in place to assist staff to understand and discharge their role and responsibilities as set out in the latest version of Part One of KCSIE

The role of the Designated Safeguarding Lead (DSL)

The DSL is a senior member of staff who takes lead responsibility for safeguarding. Responsibilities are explicitly detailed in their job description.

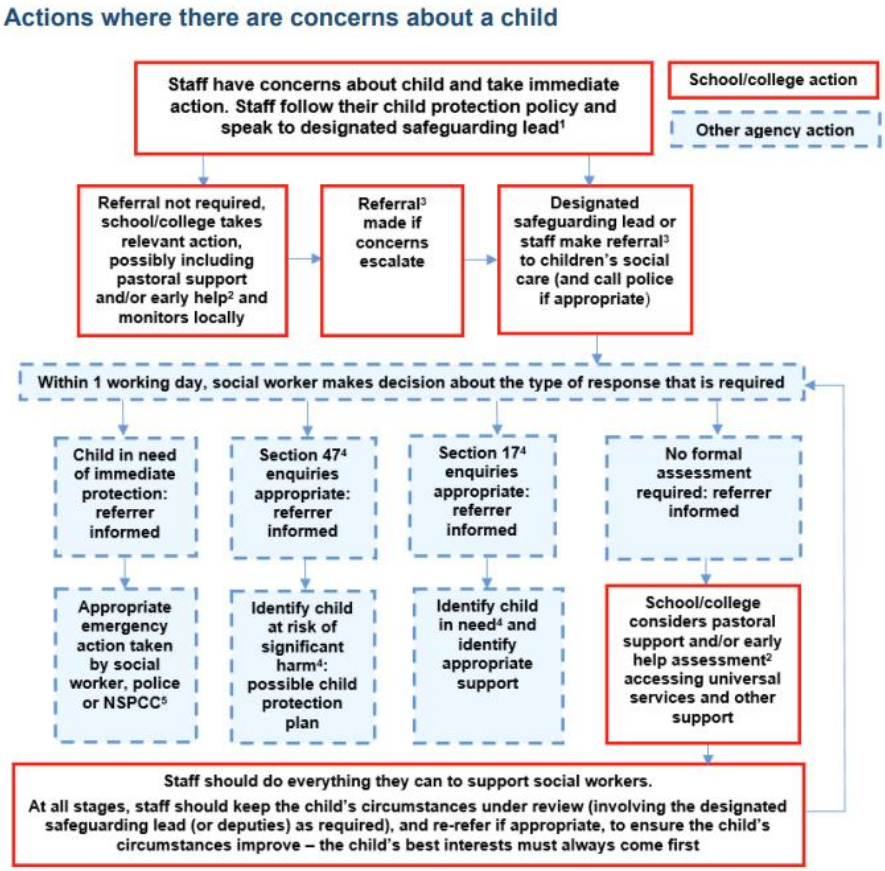
Where it is believed that a child may be suffering, or may be at risk of suffering significant harm, the DSL will work with Children's Social Care in line with "Working together to safeguard children" to support a multi-agency approach to identify and support children's needs.

The DSL takes responsibility for all safeguarding records and for deciding at what point these records should be passed over to other agencies.

Referrals

The DSL when necessary, will:

- refer cases of suspected abuse, neglect, exploitation or allegations to the relevant investigating agencies
- when deciding on the best course of action, use the following flow diagram taken from KCSIE (2025)



The DSL will also:

- refer cases to Prevent or the Channel programme where there is a radicalisation concern
- refer cases where a crime may have been committed to the Police
- act as a source of support, advice and expertise to all staff when deciding whether to make a referral by liaising with relevant agencies
- consider the view of the child when making a referral; encourage a culture of listening to children and their wishes and feelings
- act as a point of contact and liaise with the three safeguarding partners (the local authority, the clinical commissioning group & the chief officer of police)
- liaise with the respective Headteacher and/or Executive Headteacher to inform him/her of any issues and ongoing investigations (especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations). This should include being aware of the requirement for children to have an Appropriate Adult present where necessary.
- refer cases of suspected abuse, neglect, exploitation or allegations to the relevant investigating agencies
- refer cases where a person is dismissed or left due to risk/ harm to a child to the DBS as required
- liaise with all staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- understand the risks associated with online safety and that the filtering and monitoring systems are in place (working with IT technicians)
- be able to understand the unique risks associated with online safety (in particular children with SEN & disabilities) and know how to keep children safe whilst they are online in school and at home.
- be alert to the specific needs of children in need, those with educational needs and young carers
- take part in strategy discussions or attend inter-agency meetings and/or support other staff to do so and to contribute to the assessment of children
- liaise with the Local Authority and other agencies in line with 'Working Together to Safeguard Children (2023)'

- ensure that in exceptional circumstances, where the DSL / DDSL is not available, provision is in place so there is no delay in undertaking appropriate action
- where children leave the Academy; ensure their safeguarding file is handed over to the new school as soon as possible, and within 5 days for an in-year transfer or within 5 days of the start of a new term. This should be kept separate from the main student file.
- understand relevant data protection legislation regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- be aware of the arrangements for Looked After Children, in accordance with KCSIE 2025

Training

- DSL training will be undertaken every two years. Informal training and updating of knowledge and skills will be at regular intervals
- recognise how to identify signs of abuse, neglect or exploitation and when it is appropriate to make a referral
- have a working knowledge of how Safeguarding Partnerships operate (including the process concerning Starting Point and Early Help Assessment (EHA), the conduct of a child protection case conference, and be able to attend and contribute to these effectively when required to do so
- understand the Prevent Duty and provide advice and support to staff on protecting children from this in line with KCSIE 2025

Raising awareness

The DSL will:

- ensure the safeguarding and child protection policy is updated and reviewed annually in line with the KCSIE guidelines
- ensure all staff & governors have access to and understand this policy
- ensure that systems are in place and are well promoted, easily understood and acceptable for children to report their concerns knowing they will be treated seriously
- ensure parents have access to the safeguarding and child protection policy which alerts them to the fact that referrals may be made and the role of the Academy in this process
- keep detailed, accurate & secure records of concerns and referrals
- where children leave the Academy; ensure their safeguarding file is handed over to the new school as soon as possible, and within 5 days for an in-year transfer or within 5 days of the start of a new term. This should be kept separate from the main student file.
- ensure that staff understand the importance of information sharing, with the three safeguarding partners & other agencies.
- ensure that all staff have a copy of (and an understanding of) KCSIE 2025 – Part One.
- ensure that all staff receive statutory safeguarding training (including Prevent, FGM and KCSIE updates) which is updated at least annually.
- ensure that training records are kept up to date for each member of staff
- help promote educational outcomes by sharing information about the welfare, safeguarding issues that children (including children with a social worker) are experiencing or have experienced with all staff
- ensure staff understand how to deal with a safeguarding allegation against the Headteacher by informing the Chair of Governors who liaises with the LADO or other appropriate officers within the Local Authority
- when recruiting, two members of staff (which can include governors) are on each shortlisting/interview panel, one of which is safer recruitment trained
- ensure that all staff are aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989 and understand the role they may have in these assessments
- ensure that there is a structured procedure, which will be followed by all members of staff in cases of suspected abuse, neglect or exploitation
- be aware of the guidelines around Alternative Provision as set out in KCSIE 2025 – the academy continues to be responsible for the safeguarding of those students
- ensure that governing bodies, leadership and staff are aware of the DfE advice on how schools should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment including those that have happened outside of the school and/or online - KCSIE Part 5
- ensure that all staff are aware of online safety risks and filtering and monitoring systems in place

Availability

During term time the DSL lead (or a deputy) will be available (during normal school hours) for staff. Should they both be unavailable, then the most senior member of staff should be contacted, in most cases this will be the Headteacher. A nominated member of SLT will be available for all activities that take place out of normal school hours.

The role of the lead person for looked after children

The Designated Teacher is a qualified teacher who has the responsibility for promoting the educational achievement of children who are looked after, have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. They report to the DSL ensuring that the progress of the child is supported, linking with their social worker and parents where appropriate. The Designated Teacher will have appropriate training.

The role of all employees & governors

All employees & governors will be collectively responsible for ensuring that safeguarding arrangements are fully embedded and reflected in day to day safeguarding practices by:

- ensuring that safeguarding policies and procedures are followed, and appropriate action is taken in a timely manner to promote a child's welfare
- having a professional curiosity & reporting to the DSL if they have concerns about a child, recognising that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and that they may not recognise their experiences as being harmful
- recognising the importance of information sharing between agencies. Ensuring cooperation with the Local Authority and other safeguarding partners
- ensuring that employees have read at least part one of KCSIE 2025 and governors the full KCSIE 2025
- undertaking training about safeguarding to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities
- ensuring that visitors, temporary staff, contractors and volunteers who work with children are made aware of the safeguarding arrangements and their responsibilities
- ensuring appropriate responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, including child sexual exploitation and to help prevent the risks of their going missing in future
- ensuring online safety is a running and interrelated theme in the approach to safeguarding and related policies and procedures, making sure that appropriate filtering and monitoring systems are in place to protect children online
- ensuring that children are taught about safeguarding online through teaching and learning opportunities
- following Redhill Academy Trust's safer recruitment policy
- recognising that certain children are more vulnerable than others, such as looked after children and children with special educational needs and disabilities.

Governors are specifically responsible for ensuring

- that effective policies and procedures are in line with statutory guidance (Working Together to Safeguard Children (2023) as well as with local guidance and monitor compliance with them and that these policies have been read and understood
- there are mechanisms in place to assist staff to understand and discharge their role and responsibilities
- there is a training strategy in place for all staff and that training records are up to date
- that there are specific procedures in place to manage safeguarding allegations against staff, supply staff, volunteers, contractors and governors and that these are understood by all staff and are distinct from wider whistleblowing protocol

6 Training

We will ensure that safeguarding training for staff including online safety training is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. This will include:

Senior Leaders:

- The DSL and Deputy DSL will complete detailed training every two years
- We will ensure those members of staff with safer recruitment training undertake this training regularly, including nominated members of SLT.
- Will receive and read annually the full KCSIE

Staff:

- All new employees will complete initial safeguarding training on induction
- Safeguarding training is undertaken by each member of staff at least annually. Subsequent updates are shared by the DSL.
- Will receive and read annually Part One of KCSIE

Governors:

- All new Governors will complete initial safeguarding training on induction.
- Annual safeguarding training. Any subsequent updates will be shared by the DSL.
- Will receive and read annually the full KCSIE

Safer recruitment training:

- Following the Academy Staffing (England) Regulations 2009 we will ensure that there are at least two members of staff involved in the shortlisting and recruitment process one of which will have undertaken safer recruitment training. We follow all revised guidelines set out in Part 3 of KCSIE 2025 regarding safer recruitment.

7 Safeguarding as part of the curriculum

Students are helped to know about their rights and responsibilities, understand and respond to risks, to deal assertively with pressures and know who they can turn to for advice and help both in and out of the Academy, and how to make a complaint. This means they are able to recognise when they are at risk and are able to get help when they need it.

The following indicative areas are addressed as age appropriate within RSHE (secondaries), RE (primaries) and the wider curriculum:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice, equality and diversity
- Body confidence and self-esteem
- How to recognise an abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support
- What constitutes sexual harassment and sexual violence and why these are always unacceptable

8 Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. We protect and educate our students and staff in their use of technology and establish mechanisms to identify, intervene and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

-**content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation and conspiracy theories.
-**contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
-**conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
-**commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

We consider online safety whilst planning the curriculum including when students access remote learning, limiting students' exposure to the above risks by ensuring there are appropriate filtering and monitoring systems in place. The filtering and monitoring systems block harmful and inappropriate content, the DSL or nominated deputy is notified of any alerts generated by these systems and takes appropriate action which may include a referral to children's social care or the police. The filtering and monitoring provision is reviewed at least annually.

Where there is a breach to the filtering/monitoring systems, ie a child alerts staff to inappropriate content, the adult must report this to the DSL for action to be taken to prevent further breaches.

Remote Education

Where staff are interacting with students online they will continue to follow our ICT acceptable use policy. Staff who interact with children online will continue to look out for signs a child may be at risk. If a staff member is concerned about a child, that staff member will report that concern to the DSL or to a deputy DSL as they would with all safeguarding concerns.

Parents will be advised of the different avenues that are available to them to support them in helping to keep their child safe online.

9 Children potentially at greater risk of harm

We recognise that some groups of children, are potentially at greater risk of harm than others (both online and offline). The list below, is not exhaustive, but highlights some of those groups:

- Children who need a social worker (child in need and child protection plans)
- Children missing education & children absent from education (unexplainable and/or persistent absence)
- Elective home education
- Children requiring mental health support
- Looked after children and previously looked after children
- Care leavers
- Children with special educational needs and disabilities or health issues
- Children who are lesbian, gay, bi, or trans (LGBT)

SEND

We recognise that children with special educational needs (SEND) and or disabilities can face additional safeguarding challenges. Children with SEND and or disabilities are especially vulnerable when identifying concerns due to their impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

This policy reflects the fact that additional barriers can exist when recognising abuse, neglect or exploitation in this group of children which include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- these children being more prone to peer group isolation or bullying including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

Children who are lesbian, gay, bi or trans (LGBT)

We recognise that children who are LGBT can be targeted by other children and we will ensure that a safe space and a trusted adult is available for them to speak out or share their concerns.

10 Mental health

All staff are made 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. Other potentially traumatic adverse childhood experiences can have an impact.

We work with appropriately trained professionals to make a diagnosis of a mental health problem. Our staff, however, are well placed to observe children day-to-day to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their safeguarding and child protection policy.

11 Identifying children who may benefit from an early help assessment

Where parents, carers or children tell us that they require support, or staff identify that there may be emerging needs and that services might be required an **Early Help Assessment** is likely to be beneficial. In such cases staff will have an open discussion with the parents/carers and the child about the support and services that might help and agree how they would be accessed. Full details of Early Help can be found in Working Together (2023) www.gov.uk/government/publications/working-together-to-safeguard-children--2

Following a discussion, should any child emerge that may require an early help assessment, staff must raise those concerns immediately with the DSL. The DSL will then consult the Derby City & Derbyshire Threshold document to consider whether thresholds have been met. Staff also have the option of contacting Starting Point for advice and consultation line for professionals working with children via 01629 535353.

The Derby City & Derbyshire Threshold document can be found here:

https://trixcms.trixonline.co.uk/api/assets/derbyshirescp/533c00d1-338b-4a01-aea4-2244ead8358c/ddscp-threshold-document-final-december-2024.pdf

A copy of the EHA form can be found via this link:

https://trixcms.trixonline.co.uk/api/assets/derbyshirescp/b44db9d7-c873-4dfb-81f0-aa4995454f23/early-help-assessment-final-oct-23-protected.docx

Where an EHA is completed and Early Help and/or other services are appropriate, the case should be kept under constant review. At each stage of the process where the child's situation doesn't appear to be improving or additional concerns emerge, a referral to Children's Social Care will be made.

12 Reporting concerns for all staff

SAFEGUARDING IS EVERYONE'S RESPONSIBILITY - supporting information on many safeguarding issues and hyper-links to useful background material can be found in KCSIE (2025). There will be occasions when it is suspected that a child may be at risk, but there is no real evidence to support this. The child's behaviour and or appearance may have changed, their attendance at school may be reduced, their ability to concentrate and focus may have altered or there may be other physical but inconclusive signs. In these circumstances, the child should be given the opportunity to talk. A record should be made as these early concerns may contribute to a bigger picture. This should then be referred to the head of house or SLT. If the concern persists then the DSL should be involved.

If a child or adult does begin to reveal that a child is being harmed, **you should follow advice in Appendix 3.**

If information is disclosed

A 'disclosure' is when a child confides information which is of a sensitive nature, and which gives cause of particular concern. This can occur in school, online or outside of the academy, e.g. being hit at home, a sexual assault, unfed, medical needs not attended to, and inappropriate punishments by parents, continual verbal abuse and pregnancy.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should the victim ever be made to feel ashamed for making a report.

A child may approach any member of staff on their own, with a friend, or on behalf of a friend. If this happens then the student will be spoken to on their own, to ensure that the conversation remains confidential.

As soon as possible, the member of staff will write an account of the incident (in the words of the child) and then inform the DSL. Our safeguarding concerns and actions are recorded online using Cpoms.

Legal responsibility

In the exceptional case of a safeguarding issue going to court, the need for all staff involved to make and keep accurate notes is particularly pertinent. Any member of staff may be required to testify under oath.

Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate safeguarding file for each child. Records should contain:

- a clear, accurate and comprehensive summary of the concern
- separate (but attached to the initial concern), clear, accurate details of how the concern was followed up and resolved, the action taken, the decisions reached and the outcome

If in doubt about recording requirements, staff should discuss with the DSL (or Deputy DSL) before an entry is made on Cpoms, but without causing delay to any support for the child.

We will hold more than one emergency contact number for each student where possible.

13 Staff and child confidentiality

We will operate an information sharing system that has due regard for: HM Government Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024).

All staff will be mindful of the need to act responsibly when acquiring, storing, processing, sharing and disposing of information. The Data Protection Act and GDPR regulations do not prevent or limit the sharing of information, they provide a framework to ensure that it is done in a responsible manner.

Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. If in any doubt about sharing information, staff should speak to the DSL.

Fears about sharing information should not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Staff should discuss concerns with the DSL, Deputy DSL or the most senior member of staff if they are unavailable. The person will then decide who else needs to have the information and they will disseminate it strictly on a need-to-know basis.

Wherever possible, consent will be sought to share information, but where there are safeguarding concerns about a child, information will be shared with the appropriate organisations such as the Police or Children's Social Care without consent; in most cases concerns will be discussed with parents and carers prior to the referral taking place unless doing so would increase risk.

14 Allegations against members of staff, supply staff, volunteers, contractors, Governors or individuals from organisations hiring school premises

We will follow the procedures set out in this section (14) and appendix 2 of this policy in line with part 4 of KCSIE 2025. General guidance for whistleblowing can also be found on the Government website at www.gov.uk/whistleblowing/what-is-a-whistleblower and within our Whistleblowing Policy. Our own whistleblowing policy should be consulted in the first instance.

We have very clear guidance on the correct protocol / hierarchy of reporting such a disclosure based on the need for confidentiality. This is set out in the Appendix 2.

Staff must raise concerns with the headteacher if it is alleged that a member of staff (including supply staff, volunteers, contractors, governors or individuals from organisations hiring school premises) 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 would 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 that may have happened outside of school that might make an individual unsuitable to work with children, this is known as a transferable risk).

Staff must also raise concerns with the headteacher about any low-level concerns that may arise from suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the academy, examples of these are:

- being over friendly with children
- 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 students

This isn't an exhaustive list, a low-level concern can be any concern, no matter how small and even if no more than causing a sense of unease or a nagging doubt.

Concerns and allegations will be investigated to determine whether they meet the harms test or whether they are "lower level" concerns. Both will be addressed in accordance with part 4 of KCSIE 2025.

Should a member of staff find themselves in a situation whereby an allegation of abuse has been made against them, they should contact the Headteacher. Do not discuss the allegation with other staff or approach the child. The Headteacher will consult appendix 2 of this policy document and will contact the Local Authority Designated Officer.

Allegations against the Headteacher should be referred to the Chair of Governors, who will contact the LA Safeguarding team for advice.
The NSPCC also has a dedicated 'whistleblowing' helpline 0800 028 0285. Staff may raise any concerns through this facility **as a last resort**, should they not feel comfortable with any part of the protocol laid out in Appendix 2.

Staff should not feel that awareness of these potentially serious issues detracts from developing positive relationships with children or spoils the enjoyment that is derived from the challenge and pleasure of working with them. Both incidents of abuse and allegations against staff are relatively rare. Staff should feel confident in the knowledge that they know the correct procedure and how they will be supported if they are involved in a safeguarding issue.

The use of 'reasonable force'

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law.

When using reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities (SEND), mental health or with medical conditions, risks will be carefully considered and recognise the additional vulnerability of these groups.

Departmental advice for schools is available at Use of reasonable force in schools - GOV.UK For information about how to support children with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention can be found at Reducing the need for restraint and restrictive intervention - GOV.UK.

Supply staff

In some circumstances we may have to consider an allegation against an individual not directly employed by us, where its disciplinary procedures do not fully apply, for example supply teachers provided by an agency or business. In this event we will follow the procedure in KCSIE 2025 which may include informing the LADO.

Individuals from organisations hiring school premises

Where the school receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (eg community groups, sports associations, or service providers that run extra-curricular activities) we will follow the procedure in section (14) and appendix 2 of this policy in line with part 4 of KCSIE 2025, which may include informing the LADO.

15 Child-on-child abuse

We recognise that children are capable of abusing their peers. All child-on-child abuse is unacceptable and will be taken seriously. Staff are mindful that not all child-on-child abuse is reported but it could still be taking place.

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

- is serious, and potentially a criminal offence
- could put students in the school at risk
- is violent such as; hitting, kicking, shaking, biting, hair pulling, otherwise causing physical harm & initiation or hazing type violence and rituals
- involves bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- involves students being forced to use drugs or alcohol

Note: child-on-child abuse can also involve sexual abuse and sexual harassment, see section 16 for further information on this.

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

- you must record the allegation and tell the DSL, but do not investigate it
- the DSL will undertake the investigation which will include; meeting with relevant staff, students & parents (if appropriate) to establish any immediate risks
- the DSL will contact the local authority children's social care team if they feel a child is at risk of harm and follow its advice, as well as the police if the allegation involves a potential criminal offence
- the DSL will consider whether a risk assessment and/or support plan is required for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- ensuring our curriculum helps to educate students about appropriate behaviour and consent
- ensuring students know they can talk to staff confidentially through their usual safeguarding channels.
- ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Information and guidance based on the UKCIS Education Group is available at: https://www.gov.uk/government/publications/sexting-in-schools-and-colleges

Your responsibilities when responding to an incident

If you are made aware of an incident involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos (sexting), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

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

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

- the incident involves an adult
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- what the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- the imagery involves sexual acts and any student in the images or videos is under 13
- the DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

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

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

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

Informing parents

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

Recording incidents

All consensual and non-consensual sharing of nudes and semi-nude images and/or videos (sexting) incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording these incidents.

16 Child-on-child sexual violence and sexual harassment

Sexual violence and harassment can occur between children of any age and sex, including those that have happened outside of the school or college premises, and or online. Whilst any report of sexual violence or sexual harassment should be taken seriously, it is important to note that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Students with special educational needs and disabilities are also three times more likely to be abused than their peers. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage, this is referred to as harmful sexual behaviour.

All staff working with children should maintain the attitude of that child-on-child, sexual violence and sexual harassment **could happen here.**

The academy has a zero-tolerance approach to sexual violence and sexual harassment and it will never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Physical behaviour that is potentially criminal in nature will always be challenged, this includes but is not limited to; grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

All victims should be reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise

them and this should be explained in such a way that avoids alarming or distressing them. Examples of child-on-child sexual violence/sexual harassment might include where the alleged behaviour involves:

- rape
- assault by penetration
- sexual assault
- causing someone to engage in sexual activity without consent
- sexual comments
- sexual jokes or taunting
- physical behaviour such as deliberately brushing against someone or interfering with someone's clothes
- displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment (inc on social media) such as consensual & non-consensual sharing of nude and semi-nude images and/or videos, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual comments & messages, sexual exploitation and coercion

If a student makes an allegation of child-on-child sexual violence or sexual harassment against another student or you are made aware of an incident by other means (see appendix 4 for how to deal with disclosures by a child):

- you must record the allegation and tell the DSL, but do not investigate it
- the DSL will undertake the investigation which (in consultation with part 5 KCSIE 2025) will include; considering the wishes of the victim, meeting with relevant staff, students & parents (unless there is a good reason to believe that involving them would put the student at risk of harm) to establish any immediate risks
- the DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- the DSL will consider whether a risk assessment and/or support plan needs to be put in place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- the DSL will contact the children and adolescent mental health services (CAMHS) or any other external support agencies where appropriate

All risk assessments should be recorded (written or electronic) and kept under review, considering:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s) and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms

It may be necessary for a professional risk assessment by social workers and or sexual violence specialists to be completed in the event of a report of sexual violence.

We will safeguard and support the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour by:

- considering the age and developmental stage of the alleged perpetrator(s)
- considering the proportionality of the response
- considering support and sanctions
- considering any necessary support for siblings in the event of intra familial harms
- gaining advice from any external support agencies where appropriate

Consideration will also be given to supporting children who have witnessed sexual violence.

Further information on sexual violence and sexual harassment is available in part 5 of KCSIE 2025 and at: addressing-child-on-child-abuse.pdf

17 Serious violence

All staff will be made aware of the indicators which may signal children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships
- relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm
- significant change in wellbeing
- signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The range of risk factors which increase the likelihood of involvement in serious violence are:

- being male
- having been frequently absent
- been permanently excluded from school
- experienced child maltreatment
- having been involved in offending, such as theft or robbery.

18 Female Genital Mutilation (FGM)

KCSIE explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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

Any teacher who either:

- is informed by a girl under 18 that an act of FGM has been carried out on her; or
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

must immediately report this to the police, personally. This is a mandatory statutory dutyand teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and make a report on Cpoms. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and make a report on Cpoms.

19 Radicalisation and Extremism

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to our fundamental British Values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. Staff will be alert to changes in pupils' behaviour.

Report any changes in behaviour or suspicions of radicalisation, extremism and terrorism to the DSL and make a report on Cpoms. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. 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. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

20 Children who are absent from education including children with unexplainable and/or persistent absences from education

We operate a stringent attendance tracking system that is overseen by a senior leader. The tracking and use of effective attendance management strategies enables us to ensure every child is accounted for and helps prevent the risk of them becoming a child missing education in future.

We undertake to tackle persistent absentees and reports on children who are persistently absent from school and the interventions and support being put in place in line with the attendance policy.

We will only authorise leave of absence in exceptional circumstances. The Headteacher will determine the length of time that the child can be away from school. We recognise that some children seeking leave of absence, are vulnerable to risk of abuse, neglect, exploitation or travelling to conflict zones, or at risk of FGM or forced marriage. The DSL will, as soon as a concern is established, alert the relevant agencies.

Student absence will be followed up on a daily basis as a matter of priority. If a child has a continued period of unexplained absence the academy may complete a home visit within 10 days. If the matter remains unresolved then we will refer the case to the local authority children missing education team. For a student who is deemed vulnerable the academy will notify children's social care if there is an unexplained absence of up to 5 days.

The admissions register is kept up to date. The local authority will be informed of **all** deletions as soon as the grounds for deletion are met, in line with the local authority guidelines.

Statutory guidance can be found here: https://www.gov.uk/government/publications/children-missing-education

21 Elective home education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will liaise with key professionals to ensure that parents/carers have considered what is in the best interests of the child. This is particularly important where a child has SEND or a disability, and/or has a social worker, and/or is otherwise vulnerable.

The local authority will always be informed of all deletions from their admissions register when a child is taken off roll.

Appendix 1 - Further information/guidelines on good practice

Visiting speakers

We have:

- appropriate suitability and background checks on the speaker and any organisation they represent
- an understanding that staff will be present during the visit including a member of the senior leadership team who will monitor the speech to ensure it aligns with the values and ethos of the Academy and British values

Peer massage

Peer Massage involving adults to children and student to student is prohibited. The only exception to this policy should relate only to those children where it is part of their EHCP – for example in special schools.

Where massage is part of a child's EHCP, staff must gain accreditation to carry out the practice and carry it out in accordance with the plan.

Children staying with host families/exchange visits

We may make arrangements for students to stay with a host family during a foreign exchange trip or sports tour. In such circumstances this may amount to Private Fostering and we follow the guidance in KCSiE 2025 ensuring that hosting arrangements are as safe as possible.

Some overseas students may reside with host families in the UK. These parents, and all in the home over 16 years of age, will be subject to a no cost enhanced DBS with barred list check.

In the case of school-arranged homestays abroad, we will liaise with partner schools to discuss and agree the arrangements in place for the visit.

We will consider, on a case-by-case basis, whether to contact the relevant foreign embassy of the country in question to ascertain what checks are necessary. We will use professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.

Private fostering

Private fostering is when a child or young person under 16 years old (or 18 if they have a disability) is looked after for 28 days or more by someone who is not a close relative, legal guardian or person with parental responsibility. Close relatives *only* include parents, step-parents, aunts, uncles and grandparents. It is not private fostering if the child is 'looked after' by the Local Authority (also known as 'in care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer). Private fostering occurs in *all* cultures, including British culture, and children may be privately fostered at any age.

Examples of private fostering situations (for more than 28 days or intended to be more than 28 days) include:

- children and young people living apart from their families for a variety of reasons e.g. a parent is ill, has had to temporarily move for work or there has been conflict, separation or divorce
- children whose parents work or study elsewhere in the UK or overseas
- children sent to this country by their parents for education and health care
- young people living with the family of a boyfriend or girlfriend
- children on holiday exchanges

By law, the Local Authority must be informed about all private fostering situations. The child's parents, private foster carers and anyone else involved in the arrangement or who becomes aware of the arrangement, e.g. guardianship agencies, schools or health professionals are *legally required* to inform Children's Services.

Children's Services have a legal duty to make sure all private fostering arrangements are safe for the child. Once informed of the arrangement, they will check the suitability of private foster carers, make regular visits to the child and ensure advice, help and support is available when needed. Where a member of staff becomes aware that a student may be in a private fostering arrangement s/he should raise this with the DSL. Where Children's Social Care are not already aware of the circumstances, the DSL should make a referral to them.

Further information is available at: www.privatefostering.org.uk & www.ecpat.org.uk/News/dfe-training-for-foster-carers

Students with a social worker

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

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the students' safety, welfare and education outcomes. For example, it will inform decisions about; responding to unauthorised absence or missing in education where there are known safeguarding risks, the provision of pastoral and/or academic support.

Looked after children

A child who is being 'looked after' by their Local Authority is usually known as a 'Child in Care' or a 'Looked After Child'. They might be living with foster parents or at home with their parents under an Interim Care Order granted to social care, or in residential children's homes, or other residential settings like schools or secure units.

A child who is adopted is **not** a Looked After Child. Occasionally, children are placed into Local Authority foster care under an Interim Care Order when an adoption breaks down and the adoptive parents relinquish the child. Once a Full Care Order is agreed, the child remains on long term foster care. The adoptive parents may or may not have continued contact with the child, depending on the situation and the emotional impact on the child.

An Interim Care Order will remain in place until care proceedings are concluded (within 26 weeks in most authorities). At the conclusion of care proceedings in any situation, the child will either stay in long term foster care (under a Full Care Order) until they reach the age of 18 years, return to their parents (usually under a Supervision Order), reside with other family members/friends (usually under a Special Guardianship Order), or in some cases be adopted. In all of the latter situations, it is most usual for parents to have agreed contact arrangements with their child, most commonly three times per year.

A child may also have been placed in care voluntarily by their parents who are struggling to manage their children's behaviour, or meet their child's needs due to their own illnesses or disabilities (under section 20, Children Act 1989). In these cases, rehabilitation will always be the aim, but if this is not possible, the Local Authority will apply for an Interim Care Order and finally a Full Care Order. Usually, these parents will have continued contact with their child.

As a result of their experiences both before and during care, Looked After Children are at greater risk than their peers. Providing a secure, caring environment and enabling such children to develop strong, trusting and stable relationships with professionals is critical to their safety and wellbeing.

Appendix 2 - Formal procedure in reporting a safeguarding concern or allegation involving Academy employees (including supply staff, volunteers, contractors, Governors or individuals from organisations hiring school premises)

1 Action to be taken by the individual

If an individual has safeguarding concerns or an allegation is made against another member of staff (including supply staff, volunteers, contractors, Governors or individuals from organisations hiring school premises) posing a risk of harm to children in or outside of the Academy (this may include low level concerns) they should raise the matter immediately with the Headteacher.

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". Examples of low level concerns could include but are not limited to; being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with a child on a one-to-one basis in a secluded area/behind a closed door or humiliating students as stated in KCSIE 2025.

2 The protocol

2.1 As a first step, you should raise the concern with an appropriate designated person, which would normally be the Headteacher, who would then take/escalate appropriate action.

There are three exceptions to this course of action;

2.1.1 If you believe that the Headteacher is involved in the concern, then the Chair of Governors should be approached when making the initial disclosure, who would then take the appropriate action.

2.1.2 If you believe that an Executive Headteacher/Regional Director is involved in the concern, then the Chief Executive Officer of the Trust should be approached when making the initial disclosure, who would then take the appropriate action.

2.1.3 If the safeguarding disclosure is such that you do not feel able to raise it with someone connected to the Academy, then you would need to refer to the LADO.

2.3 Safeguarding Concerns against a member of Academy staff may be raised verbally or in writing, but it is preferable for an allegation to be set out in writing to the correct person in the reporting hierarchy (as set out above). It is important, however, that when the concern is raised, you make it clear that the issue is being raised under the safeguarding and child protection policy and why you feel this is in the public interest.

2.4 You will be asked to provide as much information as you can to the person who you contact, so that they can be satisfied that there are sufficient grounds for concern.

2.5 If you wish to raise the safeguarding concern in confidence, this must be made clear to the designated person who is initially contacted.

2.6 If you have raised the issue verbally then you may be asked to put your safeguarding concerns into writing at a later stage.

2.7 You may not know how or when the matter has been investigated or a conclusion reached. The confidentiality is likely to remain with the Headteacher and/or the Senior Leadership Team.

2.8 The Headteacher and/or the Senior Leadership Team will also notify the person who is the subject of the disclosure of the concern. Upon receipt of the information, this individual will be able to respond to the concern(s) raised. Unless the subject of the disclosure of the concern is an individual from an organisation hiring the school premises, in which case the LADO will automatically be notified and subsequent actions taken on the advice of the LADO.

2.9 The Academy will meet its legal duty to notify the DBS where a person has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child.

3 Additional guidance

3.1 There are circumstances under which maintaining complete confidentiality may be difficult for the Headteacher/Senior Leadership Team to maintain. For example:

- if the safeguarding matter leads to a legal procedure and evidence is required by the court.
- if the safeguarding matter raised comes within the remit of another incident and the staff member who originally disclosed the concern is asked to provide a signed statement as part of the evidence, thus revealing their identity.

4 Procedure – alerting outside bodies

4.1 An individual should always, in the first instance, look to initially defer to an appropriate designated person in the organisation about any potential safeguarding breach, as outlined above.

4.2 If the individual is not satisfied with the response given, they are entitled to contact a relevant external body to express their concerns – in the case of safeguarding disclosures, this would be the LADO.

4.3 In doing this the individual should;

- have a reasonable belief that the safeguarding disclosure is based on correct facts
- have a reasonable belief it is in the public interest to make the disclosure

4.4 If there is evidence of criminal activity, then the designated investigating officer should inform the police. We will ensure that any internal investigation does not hinder a formal police investigation.

5 Investigating allegations against staff (inc supply staff, volunteers, contractors, Governors or individuals from organisations hiring school premises)

5.1 It is essential that any allegation of abuse made against a teacher, or other member of staff including supply staff, volunteers, contractors and Governors is dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

5.2 An allegation against staff (inc supply staff, volunteers, contractors and Governors) will be investigated to determine which level of allegation/concern it falls under:

Allegations that may meet the harms threshold

5.2.1 behaved in a way that has harmed a child, or may have harmed a child and/or
5.2.2 possibly committed a criminal offence against or related to a child and/or
5.2.3 behaved towards a child or children in a way that indicates he or she may post a risk of harm to children and/or
5.2.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, this is known as a transferable risk).

Allegations/concerns that do not meet the harms threshold – referred to as "low-level concerns" the term "low-level" concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in points 5.2.1-5.2.4 above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or "nagging doubt" 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 LADO.

5.3 The following definitions should be used when determining the outcome 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.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or prior basis which supports the allegation being made.

5.4 There are two aspects to consider when an allegation is made:
1 Looking after the welfare of the child – the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
2 Investigating and supporting the person subject to the allegation – the case manager (headteacher or chair of governors) should discuss with the LADO, the nature, content and context of the allegation and agree a course of action.

5.5 The academy will follow the guidance/advice in part 4 of KCSIE 2025 to investigate the allegation/concern.

5.6 Where an allegation has been made against a member of staff, supply staff, volunteer, contractor or Governor, the LADO will be contacted for advice and guidance. Suspension will be considered only in a case where there is cause to suspect a child or other children in the academy is/are at risk of serious harm or the case is so serious that it might be grounds for dismissal.

5.7 Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within 1 working day, giving reasons as appropriate, for the suspension including the name and contact details of the person identified within the academy who will be on hand to support them.

5.8 The accused person will be informed of the allegation as soon as practically possible.

5.9 Allegations of abuse against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse should also be referred to the police.

5.10 Any investigation will be managed under the relevant disciplinary policy.

5.11 All investigations will remain confidential unless otherwise required.

5.12 Individuals will be advised to contact their trade union representative for support.

5.13 We will inform parents of any child involved in any allegation of abuse as soon as possible.

5.14 We will aim to resolve all allegations within 12 months, but ideally within 3 months.

5.15 Should the LADO or police inform the academy that a case is complete or closed, the DSL and headteacher will decide whether further action, including disciplinary procedures are required.

5.16 Where a teacher is dismissed because of serious misconduct or they might have been dismissed if they had not voluntarily resigned, consideration will be made whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

5.17 Where we choose to no longer use the services of a teacher from a supply agency because of serious misconduct, consideration will be made whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

5.18 Settlement agreements will not, under any circumstances, be offered to accused members in exchange for not pursuing disciplinary action or not meeting its legal duty.

5.19 Proven malicious and unsubstantiated claims may lead to disciplinary proceedings against the accuser at the discretion of the headteacher.

5.20 An allegation against individuals from organisations hiring school premises will immediately be referred to the LADO and any subsequent actions taken on the advice of the LADO.

6 Safe Staff and Supporting Staff

6.1 Safer recruitment processes will be followed in accordance with DfE, KCSIE 2025 and will be detailed in the Safer Recruitment Policy.

6.2 Staff will have access to advice on the boundaries of appropriate behaviour and will be aware of our staff code of conduct policy. This includes contact between staff and children outside the work context.

6.3 In the event of any complaint or allegation against a member of staff, the Headteacher, will be notified immediately. If it relates to the Headteacher, the Chair of Governors will be informed without delay. We will respond to all allegations robustly in collaboration with the Local Authority Designated Officer (LADO), the police and HR colleagues.

6.4 Staff may find some of the issues relating to safeguarding upsetting and may need support which will be provided by the Academy and through the Human Resources Team. Advice and support will be made available by the LADO and HR where appropriate to the Leadership Team.

6.5 This policy complements and supports a range of other policies, these include but are not limited to:

- Attendance policy
- Behaviour policy
- Special educational needs & disabilities policy
- Sex and relationships education policy
- Equality policy
- Safer recruitment policy
- Code of conduct
- Acceptable use policy

Appendix 3 – Procedure for reporting a disclosure

A child may approach any member of staff on their own, with a friend, or on behalf of a friend. It is advised to speak to the child concerned with at least 2 members of staff present.

During the conversation with the child:

- Firstly, ensure that the environment is appropriate, and the conversation is confidential
- When speaking directly with a student making a disclosure, it should be recorded in hard copy in the first instance and this hard copy should be retained or the copy should be scanned into Cpoms without any alterations being made to the original.
- Always believe the student and take the matter seriously, even if what is heard sounds unlikely. It may have taken time and courage to speak to an adult. If it is found to be not entirely true, the student still needs help and support
- Speak to the child in a quiet place straight away. Arrange emergency cover for duties if required. Request support from the DSL/DDSL or Senior Leadership Team if necessary. Use the nearest office/quiet space, preferably with a telephone and a mechanism to record the safeguarding incident. This disclosure will be reported up to the DSL
- Stay calm. Reassure the child
- Listen carefully and make notes. Only prompt the child by asking open questions e.g. What happened after that? What did he do then? How did that make you feel? Write notes using the student's own words/descriptions. Do not put words in the child's mouth and avoid leading questions/extensive questioning
- Take as much time as the child needs. Expect and respect silences
- Reassure the child that they have done the right thing. Helpful phrases are: 'It's not your fault. I am sorry this has happened to you. I am glad that you have told me. I will make sure that you get help'
- Make sure the child understands that this information will need to be passed on to someone else in order to help them. This will only be on a 'need to know' basis; it will be confidential to as few people as possible
- Explain the role of the DSL to them
- Ensure any questioning is of an 'Open Nature', do not lead the child with regular questioning

What not to do:

- Do not delay speaking to the child
- Do not promise to keep secrets or confidentiality
- Do not ask leading questions e.g. Did she hit you? Were you afraid?
- Do not interpret events when making notes
- Do not investigate further, refer to the DSL