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## 1. POLICY STATEMENT

This policy applies to each academy in the Great Academies Education Trust. GAET requires each Academy's Local Governing Committee to review and update this policy annually (as a minimum). This policy is available on the Academy website. This policy is ratified annually by the GAET Board or delegated to the Outcomes Committee.

This policy aims to ensure that GAET and its academies safeguard and promote the welfare of all of the students.

Great Academies Education Trust ensures that all students are safeguarded. We do not discriminate against anyone on the grounds of their sex, race, colour, religion, nationality, ethnic or national origins. This is in line with the Equality Act 2010 and covers both direct and indirect discrimination.

Our approach to safeguarding is informed by:

### Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (Academy Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019

### Statutory guidance

- DfE (2025) Keeping children safe in education (KCSIE)
- DfE (2023) Working Together to Safeguard Children
- DfE (2019, last updated Dec 2025) Relationships Education, Relationships and Sex Education (RSE) and Health Education (for teaching until 31 August 2026)
- HM Government (2013 updated April 2023) Multi-agency practice guidelines: Handling cases of Forced Marriage
- DfE (2023) Revised Prevent duty Guidance for England & Wales
- DfE (2018) Disqualification under the Childcare Act 2006
- DfE (2017) Preventing and Tackling Bullying

### Non-statutory guidance

- DfE (2015) What to do if you're worried a child is being abused: advice for practitioners
- DfE (2024) Information sharing
- DfE (2017) Child sexual exploitation
- The Great Academies Education Trust (GAET) values
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
- New definition of extremism (2024)

This policy also takes into account the procedures and practice of the academy's Local Authority and the published safeguarding arrangements set out by the local safeguarding partners.

This policy recognises that safeguarding is EVERYONE'S responsibility. Everyone, who comes into contact with children and their families, has a role to play. GAET will ensure that its academies adopt a whole school approach to safeguarding. This means ensuring that safeguarding and child protection underpin all relevant aspects of process and policy development. Academy staff who work with children and young people should have an attitude of '**it could happen here**' and no reports in the academy does not mean that it is not happening. Where there is a safeguarding concern the academy will ensure that the child's wishes and feelings are taken into account and

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systems are in place for children to express their views and offer feedback.

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## 2. CONCERNS ABOUT A CHILD

The Academy has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding, promoting the welfare of children and protecting them from harm is **everyone's** responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

The Academy has arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers.

### Definitions of Safeguarding and Types and Signs of Abuse

Safeguarding and promoting the welfare of children is defined as

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

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

Appendix 1 of this policy provides further detail of the types of abuse and possible signs of abuse.

## 3. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

A Designated Safeguarding Lead (DSL) is established in each academy. The DSL is a member of the Senior Leadership Team. Deputy DSLs are also identified. The name of the designated members of staff for safeguarding will be clearly visible in each academy, with a statement explaining the academy's role in referring and monitoring cases of safeguarding concerns. All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of the Trust's Safeguarding & Child Protection Policy, and reference to it in Parents' information such as prospectus or handbook.

All staff should be aware that children and young people may not feel ready or know how to tell someone that they are being abused, exploited, neglected and/or they may not recognise their experiences as harmful; e.g. Children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have any concerns about a child.

### Raising safeguarding concerns

All staff will know how to identify, raise, record and refer safeguarding concerns, including child protection concerns. They will be aware of the difference between children who are of concern, and those in immediate danger or at risk of harm. The DSL will ensure that all staff understand how to raise and record all concerns. All members of staff, supply staff, governors and volunteers are provided with child protection awareness information at induction, included in their arrival pack, the academy safeguarding procedures so that they know who to discuss a concern with.

Disclosures or information may be received from students, parents or other members of the public. The Academy recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom

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they will speak. Accordingly, all staff will handle disclosures with sensitivity. Such information cannot remain confidential and staff will immediately communicate what they have been told to the Designated Safeguarding Lead and make a record using the agreed academy system.

### Acting on concerns

The DSL will ensure that relevant procedures are used for providing support for children at risk of harm or known to be subject to abuse. The DSL is the point of contact for all child protection concerns, including those related to fabricated or induced illness (FII), child sexual exploitation (CSE), child criminal exploitation (CCE), forced marriage, honour-based abuse including female genital mutilation (FGM) and the risk of radicalisation. The appropriate methods for escalation of concerns will be used. This will often involve significant multi-agency involvement as described in national and local guidance.

If staff suspect or hear an allegation or concern of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain to the child that staff will only share the information with those who need to know to help the child. All staff should explain next steps and who the information will be passed to.

All staff will be made aware of the necessity to make accurate and timely records relating to any safeguarding concerns, discussions and decisions. These will be recorded using the Academy's online information management system. Where a report includes online elements, staff are reminded not to view or forward any illegal images of a child but note what has been reported.

Where there is a safeguarding concern, the Academy will ensure the student's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. It may also be necessary to assign additional support in cases where students may have SEND/EAL needs.

Safeguarding information will often be special category personal data and the Academy will have due regard to its data protection obligations when sharing such data. Whilst the Academy aims to get consent to share information, relevant personal information may be shared without consent if there is a lawful basis to do so such as where a child's safety may be at risk. This is because the Data Protection Act 2018 includes 'safeguarding children and individuals at risk' as a condition that allows information to be shared without consent. Any decision to share or withhold information will be recorded together with the reasons for it and who the information has been given to. The Academy operates its processes with the best interests of the student at their heart.

Information sharing is vital and the academy has clear powers to share, hold and use information in order to identify and tackle all forms of abuse and neglect. The academy will ensure that key staff comply with the relevant data principles (as outlined in the Data Protection Act 2018 and the UK GDPR).

### What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child's welfare they should act immediately. Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead in order that (s)he can make an informed decision of what to do next.

If, in exceptional circumstances, the DSL or DDSL is not available, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible.

The DSL will consider the appropriate action to take in accordance with the threshold document published by the

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Academy's local safeguarding partners. Options will include:

- managing any support for the child internally via the Academy's own pastoral support processes;
- making an early help assessment; or
- making a referral for statutory services or to the Police.

If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure that the child's situation improves.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### Early Help

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from education care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect and/or exploitation;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child;
- Is persistently absent from education, including persistent absences for part of the school day;
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, and in alternative provision or a pupil referral unit;
- Has a parent or carer in custody, or is affected by parental offending;

Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse – refer to Keeping children safe in Education document (KCSIE).

In the first instance, staff who consider that a student may benefit from early help should discuss this with the Academy's DSL or DDSL. If early help is appropriate, the DSL will generally lead on liaising with relevant agencies and setting up inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. The DSL will support staff in liaising with external agencies and professionals in an interagency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to children's social care if the student's situation does not appear to be improving or is getting worse.

### What staff should do if a child is suffering, or is likely to suffer from harm

If staff (including governors, agency staff and volunteers) believe that a child is suffering, or is likely to suffer from harm, or is in immediate danger it is important that an **immediate** referral to children's social care (and/or the Police if appropriate) is made in accordance with the Local Authority referral process. Anyone can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The Safeguarding Children Board is still currently in operation. A full copy of their local procedures can be

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found at <https://www.tamesidesafeguardingchildren.org.uk>

### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the Academy's normal referral processes to prevent people from becoming terrorists or supporting terrorism, as set out above. This may include a referral by the DSL to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child becoming a terrorist or supporting terrorists they must call 999 or ask the DSL to submit a referral form to MASH or call them directly. Advice and support can also be sought from children's social care.

The Academy, in recognition that students need to be prevented from becoming terrorists or supporting terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL or DDSL and governors responsible for safeguarding] to ensure the Academy's safeguarding arrangements are sufficiently robust to help prevent and protect children from becoming terrorists or supporting terrorism and are regularly revised.

### **What staff should do if they discover an act of Female Genital Mutilation ('FGM')**

All staff should speak to the DSL or DDSL about any concerns about FGM. Teaching staff have a separate duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. All staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect or discover that a student may be at risk of FGM.

### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly on repeat occasions, is a potential indicator of a range of safeguarding possibilities which are a potential indicator of abuse or neglect, including sexual exploitation, FGM, forced marriage or travelling to conflict zones. Academy staff will be alert to these safeguarding concerns when a student is regularly absent or goes missing for an extended period, including on repeat occasions. The Academy's procedures for unauthorised absence and for dealing with children who go missing from education are included in the Academy's attendance policy. Further detail can also be found at Appendix 1 of this policy.

The Academy will report to the Local Authority a student who fails to attend academy regularly or has been absent from academy without the Academy's permission for a continuous period of 10 academy days or more.

### **What staff should do if they have concerns about another staff member (including volunteers)**

If staff have safeguarding concerns, or an allegation is made about another staff member posing a risk of harm to children, then this should be referred to the Principal and/or DSL. Where there are concerns/allegations about the Principal or DSL, where applicable, this should be referred to the Chair of the LGC. In the event of concerns/allegations of abuse being made, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and GAET's Guidance on Dealing with Allegations of Abuse against Teachers and Other Staff.

### **What staff should do if they have concerns about safeguarding practices in the academy**

Where staff have concerns about poor or unsafe practices and potential failures in the Academy's safeguarding regimes, these should be raised in accordance with the Academy's whistleblowing procedures which can be found on the academy's website and SharePoint. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the Academy, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page in Appendix 2 of this policy.

## **4. ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS**

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**Child-on-child Abuse including sexual violence and harassment and youth produced sexual imagery (sexting)**

Safeguarding issues can manifest themselves via child-on-child abuse. Child-on-child abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Keeping Children Safe in Education 2025 includes a specific section on child-on-child sexual violence and sexual harassment. Academies should follow this advice in relation to reported incidents.

All academies recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be 'victims' and boys 'perpetrators') but also that it is not limited to the abuse of children of one sex on another. All staff working with children are advised to maintain an attitude of 'it could happen here'. Even if there are no reports in their school it does not mean it is not happening. It may be the case that it is just not being reported. As such, if staff have **any** concerns regarding child-on-child abuse, they should speak to the DSL (or deputy).

All such abuse is unacceptable and must be taken seriously. Child-on-child abuse is most likely to include, but may not be limited to:

- Abuse in intimate personal relationships between peers;
- Bullying (incl. cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, jokes and online sexual harassment or misogynistic messages which may be stand alone or part of a broader pattern of abuse;
- the non-consensual sharing of indecent images\*, especially around chat groups, and the sharing of abusive images, nudes, videos and pornography to those who do not want to receive it (see further below);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- initiation/hazing type violence and rituals (this could be activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Child-on-child abuse can be associated with factors outside the Academy and can occur online and offline and between children of any age or gender. The Academy therefore takes a contextual safeguarding approach to managing child-on-child abuse.

Child-on-child abuse is abuse and is never acceptable. It should never be passed off or dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Each academy takes steps to minimise the risk of child-on-child abuse such as:

- displays on corridors
- assembly delivery
- PSHE curriculum content focussed on child-on-child abuse (incl. No means No message)
- Providing updated staff training
- Creating a specific child-on-child reporting category on CPOMs
- Encouraging tolerance, understanding and diversity
- Challenging all low level child-on-child abuse and refusing to accept this as banter.

Students are educated that consensual image sharing, especially between older children of the same age, whilst not being classed as abusive, is illegal, whilst non-consensual sharing is illegal and abusive. The academy's approach to students' sharing nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual

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imagery) is in line with English law and all matters are reported to the Police. Further guidance can be found in the UKCIS *Sharing nudes and semi-nudes: advice for education settings* guidance.

### **Decisions should be made on a case-by-case basis**

The response to reports of child-on-child sexual violence and sexual harassment will be decided on a case-by-case basis with the designated safeguarding lead (DSL) taking a lead role, supported by other agencies as required.

The following is effective practice outlined in the part 5 of Keeping Children Safe in Education 2025.

### **Immediate response to a report**

The academy's first response to a report from a child is important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is vital that ALL victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. All staff should be able to reassure victims in this regard. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

It is important to recognise that young people or children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice. In some cases, the victim may not make a direct report; it may come to staff's attention via a friend or a conversation that is overheard. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff should be trained to manage a report; this includes listening to the disclosure appropriately. In addition, staff should **not** view any photos or videos of a sexual nature.

If a child may be in immediate danger or at risk of harm, there should be no delay in making a referral to children's social care. If an offence has been committed, it should be reported to the Police.

If the DSL (or a deputy) isn't involved in the initial report, they should be informed as soon as possible.

Where there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment, considering:

- The victim, especially their protection and support
- The alleged perpetrator
- All other children at the academy (and adult students and staff, if appropriate), especially any actions that are appropriate to protect them

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. Risk assessments should be recorded and kept under review.

The DSL (or a deputy) should engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers or sexual violence specialists will be required. The DSL (or deputy) should use these assessments to inform the academy's approach and update its risk assessments.

### **Managing the report**

The DSL (or a deputy) is likely to be the most appropriate person to advise on the academy's response to the report.

The academy treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the harm or abuse, and the child who has allegedly been responsible for it. Immediate consideration will be given as to how best support all children involved/impacted.

How the report is managed, including when to inform the alleged perpetrator, will depend on a number of important considerations. The academy will consider the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following liaison with children's

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Where a report is going to be made to children's social care and/or the Police, as a general rule the academy should speak to the relevant agency to discuss next steps and how the alleged perpetrator will be informed.

There are four likely scenarios for your academy to consider when managing reports:

1. Manage internally, where this is considered appropriate in the circumstances, and early help or statutory interventions are not required
2. Early help, as outlined in chapter 1 of Working Together to Safeguard Children, where statutory interventions are not required
3. Referrals to children's social care, where a child has been harmed, is at risk of harm, or is in immediate danger
4. Reporting to the police (usually in parallel with a referral to children's social care), where a report of rape, assault by penetration or sexual assault is made.

Where scenarios involve working with children's social care, the academy should not wait for the outcome of an investigation before protecting the 'victim' and other children. The DSL (or deputy) should work closely with children's social care to ensure the academy's actions do not jeopardise a statutory investigation. There should be immediate consideration for safeguarding the alleged 'victim', alleged 'perpetrator' and all other children. If it necessary for a student to be interviewed by the Police in relation to allegations of abuse, the academy will ensure that, subject to the advice of the local safeguarding partners, parents are informed as soon as possible and that the students involved are supported during an interview by an appropriate adult and until the investigation is completed.

### **Ongoing response The victim**

How the academy supports the victim will depend on:

- The age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim

Academy staff should also be aware that victims may not disclose the whole picture immediately, so dialogue should be kept open and encouraged.

The academy recognises that children with special educational needs, disabilities or certain health conditions can be more prone to child-on-child group isolation than other children and will consider additional pastoral support for those students which could include: assigning a key worker, time out cards etc.

### **The alleged perpetrator**

It can be difficult to balance the need to safeguard the victim (and other children) with providing the alleged perpetrator with an education and safeguarding support and implementing disciplinary sanctions.

The academy should consider support (and sanctions) on a case-by-case basis, considering:

- The age and developmental stage of the alleged perpetrator
- The nature of the allegations and risk of harm to other children
- Any unmet needs that the alleged perpetrator may have

### **Youth produced sexual imagery (sexting)**

Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they take an explicit photo or video of themselves or a friend. Where there is a disclosure or the academy becomes aware that a student may have been involved in sending youth produced sexual imagery it will refer to the guidance in the document 'Sexting in Academies and Colleges, responding to incidents and Safeguarding young people' published by the UK Council for Child Internet Safety (2016).

Staff understand that when an incident involving youth produced sexual imagery comes to their attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate academy staff
- There should be subsequent interviews with the young people involved (if appropriate)

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- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process, if there is a concern a young person has been harmed/is at risk of harm or the incident involves an adult, a referral should be made to children's social care and the police immediately.

It is important that children and young people understand their academy's policy towards youth produced sexual imagery. This reinforces the inappropriate nature of abusive behaviours and can reassure children and young people that their academy will support them if they experience difficulties or have concerns.

### Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can occur between children outside of these environments. All staff, most especially members of the safeguarding team (i.e. DSL and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## 5. ARRANGEMENTS FOR DEALING WITH CONCERNS/ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF

The Academy's procedures for managing concerns/ allegations against staff who are currently working in the Academy follows Department for Education statutory guidance and LCSB or local safeguarding partners arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student;
- Possibly committed a criminal offence against or related to a student; or
- Behaved towards a student in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (incl. behaviour that may have happened outside school, that might make them unsuitable to work with children a 'transferrable risk')

Allegations against an adult who is no longer working/volunteering with children should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO. Abuse can be reported no matter how long ago it happened.

### Allegations that may meet the harms threshold

If an allegation is made against anyone working with children in the Academy, the Academy should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the Academy may discuss informally with the 'designated officer' on a no-names basis. All allegations should be investigated as a priority to avoid any delay.

All allegations against staff, supply staff and volunteers, will be dealt with in line with the academy's *Managing allegations against staff* policy - a copy of which will be provided to, and understood by, all staff.

Where the academy has to consider an allegation against an individual not directly employed by them e.g. an agency to access supply staff, the Academy will inform them of its processes for managing allegations, including any updates to the relevant policies, and liaise with the agency's human resources manager/provider where necessary.

When an allegation is made, an investigation will be carried out to gather enough evidence to establish whether it has a foundation, and the academy will ensure there is sufficient information to meet the [DBS referral criteria](#).

On conclusion of a case, where an individual is removed from regulated activity – this could be due to suspension, redeployment to work that is not in regulated activity, dismissal or resignation – the academy will refer the case to

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the DBS as soon as possible.

If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSC.

### **Concerns that do not meet the harm threshold/low level concerns**

As part of its whole school approach to safeguarding, the Academy will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers (including governors) and contractors) are dealt with promptly and appropriately.

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour 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 or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Low-level concerns about a member of staff should be reported to the principal. Where a low-level concern is raised about the principal, it should be shared with the chair of governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the academy, that concern should be shared with the principal, and recorded and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the staff member sharing the concern does not wish to be named the academy will respect this person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example where it is necessary in order to carry out a fair disciplinary investigation) and, for this reason, anonymity can never be promised to members of staff who share.

The principal will determine the next steps, based on the information provided. Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis. Advice should be sought from Human Resources and legal services (where necessary) about next steps.

There are a number of potential outcomes e.g.

- If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the academy's Code of Conduct and the law it will still be relevant for the Principal to inform the member of staff in question what was shared about their conduct, and to give them an opportunity to respond accordingly. In addition, the Principal should speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the academy's Code of Conduct and the law.
- Some will not give rise to any ongoing concerns and therefore, will not require any further action.
- Other may be most appropriately dealt with by means of management advice and/or training.
- A low-level concern may require a conversation with the member of staff about whom the concern has been raised. This should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required of their behaviour, what support the member of staff may feel they

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need to achieve this - being clear about the consequences should they fail to reach the required standard or repeat the behaviour in question.

- Some low-level concerns may raise issues of misconduct or poor performance.
- Some concerns may trigger the academy's disciplinary, grievance or whistleblowing procedures - which would then be followed.
- The Academy should exercise its professional judgement and, if in any doubt, should seek guidance from other external agencies including the LADO.

The principal should review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified.

All low-level concerns should be recorded in writing by the principal. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Adults about whom a low-level concern has been raised may have rights of access to such records, provided of course that this would not also unreasonably disclose information of children concerned.

The academy will refer to Part Four, Section Two of Keeping Children Safe in Education (DfE, 2025) for further advice and guidance.

## 6. STAFF BEHAVIOUR POLICY / CODE OF CONDUCT

The staff behaviour code of conduct contains guidance about behaviour and actions, so as to not place students or staff at risk of harm or of allegation of harm to a student.

## 7. SAFER RECRUITMENT

The Academy is committed to safer recruitment processes and ongoing safer working practices. The Academy adopts recruitment procedures which deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in the academy.

Members of the teaching and non-teaching staff at the Academy including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Under no circumstances will an individual commence work unsupervised in sole charge of, or in unaccompanied contact with, children without a cleared DBS check. In this case, the individual will have a separate Barred List check and the Academy will undertake a written Risk Assessment exercise in relation to the proposed work. All other safeguarding checks will be completed and the individual will be appropriately supervised. We will inform shortlisted candidates if online checks form part of due diligence.

The Academy's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriate supervised is set out in the Academy's Recruitment and Selection Policy.

## 8. MANAGEMENT OF SAFEGUARDING

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the Academy. The DSL's responsibility is to maintain an overview of safeguarding within the Academy, to open channels of communication with local statutory agencies, to liaise closely with children's social care and the police), support staff in carrying out their safeguarding duties children's social care and the police), support staff in carrying out their safeguarding duties and to monitor the effectiveness of the Academy's policies and procedures in practice. The DSL (and DDSL) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on a response to a safeguarding concern.

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Academy, the DSL will also ensure their child protection file is transferred to the new academy (separately from the main student file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will also consider if it would be appropriate to share any information with the new academy in advance of a child leaving. For example, information that would allow the new academy to continue supporting victims of abuse and have that support in place for when the child arrives. The Academy will ensure that key staff, such as the SENCO, are also aware of these arrangements, as required.

The DSL regularly reviews the Academy's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in their absence, to a member of the senior management team or directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during academy hours) for staff in the Academy to discuss any safeguarding concerns. For out of hours/out of term activities, the Academy's arrangements are the DSL or Level 3 trained member of the safeguarding team are available during academy holidays. Full details of the DSL's role can be found at Annex B of KCSIE.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

### Supporting students

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the academy may provide the only stability in the lives of children who have been abused or who are at risk of harm. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. We recognise that abuse is not always perpetrated by adults, and that children and young people can be at risk of child-on-child abuse.

Our academies will support all students by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, and not condoning aggression or bullying;
- Enabling them to recognise when they are at risk and how to get help when they need it;
- Providing a curriculum which enables students to identify the possible risks to themselves including on-line risks and child-on-child abuse and that makes it clear that abuse should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up";
- Ensuring the curriculum related to safeguarding, and the support provided for students, takes into account the wider environmental factors in a child's life (contextual safeguarding);
- Promoting a caring, safe and positive environment within the academy;
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- Considering the need for appropriate assessments such as through the use of the Early Help Assessment (EHA) or similar methodology when it is identified that there are low level concerns or emerging need;
- Notifying Children's Social Care as soon as there is a significant concern;
- Providing continuing support to a student about whom there have been concerns who leaves the academy by ensuring that appropriate information is copied under confidential cover to the student's new setting and ensuring the academy medical records are forwarded as a matter of priority;
- Undertaking appropriate risk assessments to ensure the safety of vulnerable students in academy;
- Recognising that there may be particular groups of students at risk of harm and requiring Early Help or other interventions. Staff should be particularly alert to the potential need for early help for a student who:
  - is disabled and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - is a Looked After Child (LAC)
  - is a young carer

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- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child

### Confidentiality

We recognise that all matters relating to safeguarding and child protection should be subject to appropriate confidentiality. The Principal or DSLs will disclose any information about a student to other members of staff on a need to know basis only. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. We will always undertake to share our intention to refer a child to Children's Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

NB All staff must be aware that they cannot promise a student to keep secrets which might compromise the child's safety or wellbeing.

### Supporting staff

We recognise that staff working in the academy who have become involved with a student who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

Safeguarding Children supervision can help practitioners to keep a focus on the child, to avoid delay in action, to maintain objectivity and to address the emotional impact of the work. Safeguarding supervision support will be provided for DSLs through the Trust. It is the responsibility of the Designated Safeguarding Lead to provide support, supervision for any member of staff with particular responsibility for safeguarding.

### Disciplinary Procedures

All staff will understand that non-adherence to the Trust's Safeguarding and Child Protection Policy could mean that they are in breach of The Trust's Disciplinary Policy. Each academy will implement the Trust's Disciplinary Policy for any member of staff causing significant concern in respect of their implementation of the Safeguarding and Child Protection Policy. Any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.

## 9. TRAINING

The role of the designated safeguarding lead carries a significant level of responsibility and they are given the additional time, funding, training, resources and appropriate supervision support that they need to carry out the role effectively. DSLs undertake relevant training, and biennial updates. All new members of staff, temporary staff and supply staff will be given access to the Safeguarding and Child Protection Policy and Procedures, with the DSL's and deputy DSL's names clearly displayed, as part of their induction into the academy. All members of staff and governors are trained in and receive regular updates in safeguarding, including child protection, e-safety and the Prevent duty throughout the academic year.

**All Staff** are required to:

- Read Part One of KCSIE and confirm that they have done so via a signed form. Each time Part One of KCSIE is updated by the Department for Education, Staff will be updated on the changes via email.
- Understand key information contained in Part One of KCSIE. The Academy will ensure staff understanding by

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delivering training.

- School leaders will also be required to read Annex B of KCSIE.
- Receive training in safeguarding and child protection regularly, in line with advice from the LCSB. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at need to be prevented from becoming terrorists or supporting terrorists; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake training relating to online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The Academy provides these via, for example, emails, e-bulletins and staff CPD sessions and meetings.

### DSL(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, supporting SEND children particularly when online, overseeing online safety in academy, record keeping and promoting a culture of listening to children, training in the LCSB approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of KCSIE.

In addition to this formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. The DDSL is trained to the same level as the DSL.

## 10. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Barbara Daykin is the board-level person designated to take a lead in relation to responsibility for the Trust's safeguarding arrangements. There is also the LGC safeguarding lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the Academy.

A review of the Academy's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The review of each academy's safeguarding processes is externally commissioned by GAET, using Anchored Schools. The Academy draws on the expertise of staff, including the DSL(s), in shaping the Academy's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the Academy will work with the Local Authority designated officer to determine whether there are any improvements to be made to the Academy's procedures or practice to help prevent similar events in the future.

## 11. THE ACADEMY'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

### Teaching children how to keep safe

The local governing committee ensures that all students are taught about safeguarding, including online, as part of providing a broad and balanced curriculum; this includes covering relevant issues through Health, Relationships and Sex education and PSHE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. It will also include teaching students, for example about healthy relationships, consent and that sexual violence and sexual harassment is always wrong.

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The Academy recognises the additional risks that children with SEND face online and works to ensure that additional support and measures are in place to support these children. Online safety is an integral part of the Academy's ICT curriculum and also embedded in PSHE and Health, Relationships and Sex education.

### Online Safety

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online. Where students need to learn online from home, the academy will support them to do so safely in line with the e-safety policy and government [guidance](#).

Through training, all staff members will be made aware of the following:

- Student attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a student's online activity.

The breadth of issues classified within online safety is considerable and quickly evolving, (such as the development in AI technology) but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) 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.
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The Academy has appropriate filters and monitoring systems in place to safeguard children from this potentially harmful and inappropriate material online, which are regularly reviewed to ensure effectiveness. The Academy's systems are SMOOTHWALL, which not only allows the application of age-appropriate filtering but provides real time monitoring alerts should pupils try to access potentially harmful material. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. The academy will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what students can be taught regarding online teaching.

The Trust adhere to the DfE's guidance for the [procurement of Generative AI products](#). This clarifies acceptable product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

We recognise that pupils may have access to unfiltered internet through 3G, 4G and 5G technology on their personal mobile phones. As such we ensure that appropriate protocols are in place to reduce this risk and they can be found in the E-Safety policy.

Further detail of the Academy's approach to online safety can be found in the GAET E-Safety Policy and in the Academy's E-Safety Policy and the Academy's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the Academy's systems. The DSL will be alerted to any points of concern and will act upon this in the most swift and timely manner. The DSL will ensure that parents or carers are informed of such concerns.

### Looked after children (and previously looked after children) and students with Kinship care arrangements

Looked after children (and previously looked after children) are a particularly vulnerable group. The Academy will ensure that prompt action is taken when necessary to safeguard these children and the local governing committee ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are

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looked after and previously looked after by a local authority.

Each academy has a designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs identified in personal education plans are met. In line with statutory guidance available in [Promoting the education of looked after and previously looked after children](#), the Academy ensures that the designated member of staff receives appropriate training in order to carry out their role and has the information they need in relation to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual academy head.

Academies will work closely with the Virtual Schools Head to promote the achievement of pupils currently in care, pupils with social worker involvement and those pupils with Kinship care arrangements.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual schools heads to promote their educational achievement.

### **Special Educational Needs and/or Disabilities**

Students with SEN, disabilities or certain health conditions may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. Students with SEND are more likely to be abused by their peers. The barriers to recognising abuse and neglect of SEND students can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

### **Alternative Provision**

In line with [statutory guidance](#), where an academy places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should therefore be satisfied that the placement meets the pupils needs. To this end, academies will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff in line with Safer Recruitment practice.

Academies must always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. Academies will regularly review the alternative provision placements they make. Reviews will take place at least half termly to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

### **Lesbian, Gay, Bi or Trans (LGBT)**

Children who are LGBT can be targeted by their peers. In some cases, a student who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

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All schools within Great Academies Education Trust will work in partnership with parents, where appropriate, to support the young person. The individual needs of the young person will always be considered.

Great Academies Education Trust has a zero tolerance to bullying behaviour, any incidents will be handled in line with the behaviour policy and anti-bullying policy.

Government consultation regarding LGBT support is currently ongoing at the time of policy update, should an update be required this will take place during the academic year.

### **Children and the court system**

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

### **Children who go missing from education or academy**

A child going missing is a potential indicator of a range of safeguarding possibilities, such as abuse or neglect. The Academy attempts to hold more than one emergency contact number for each student so additional options are available to make contact with a responsible adult when a child goes missing is also identified as a welfare and/or safety concern.

Staff must follow the Academy's procedures for dealing with children who go missing, particularly on repeat occasions. The Academy's procedure for dealing with children who go missing can be found in the Academy's Attendance Policy. All unexplained or unauthorised absences will be followed up in accordance with this policy. Where there is concern that a student may be at risk of being a child missing education, the relevant LA officers must be informed of any student who:

- Has been taken out of academy by their parents and are being educated outside the academy system, e.g. home
- Has ceased to attend academy and no longer live within a reasonable distance of the academy.
- Has been certified by a doctor as unlikely to be in a fit state of health to attend academy before ceasing to be of compulsory academy age, and neither he/she nor his/her parent has indicated the intention to continue to attend the academy after ceasing to be of compulsory academy age.
- Is in custody for a period of more than four months due to a final court order and we do not reasonably believe they will be returning to the academy at the end of that period.
- Has been permanently excluded.

The Academy shall inform the local authority of any student who is going to be added to or deleted from the Academy's admission register at non-standard transition points in accordance with the requirements of the Education (Student Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory academy age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

Academy attendance registers are carefully monitored to identify any trends. The Academy will inform the local authority (and the local authority where the child is normally resident) of any student who fails to attend academy regularly, or has been absent without the Academy's permission for a continuous period of 10 academy days or more.

Action should be taken in accordance with this policy if any absence of a student from the Academy gives rise to a concern about their welfare.

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

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly

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county lines. It is important the academy's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. The academy will therefore follow the DfE's statutory guidance on school attendance [Working together to improve school attendance](#) which sets out how schools must work with local authority children's services and other agencies where school absence indicates safeguarding concerns.

### **Children with family members in prison**

Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such students and report any concerns to the DSL or DDSL in accordance with this policy.

### **Radicalisation**

Protecting children from the risk of radicalisation is part of the academy's wider safeguarding duties. There is no single way of identifying a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through different methods such as online. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include the DSL or DDSL making a referral to the Channel programme.

The academy will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the academy will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed with a child's parents, unless the academy has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

### **Use of 'reasonable force'**

The Academy recognises the additional vulnerability when using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions. The Academy will consider its duties under the Equality Act 2010 and their Public Sector Equality Duty. Positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

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### Arrangements for Visiting Speakers

The Academy has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The Academy's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the Academy and British values.

The Academy is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the Academy. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the Academy may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the Academy site, will be supervised by a academy employee. On attending the Academy, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The Academy shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Visitors from 'trusted organisations' i.e., Children's Social Care can work unsupervised with students.

### Police attendance on academy site (Statutory guidance – PACE Code C 2019)

A student may only be interviewed at their place of education in exceptional circumstances and only when the principal or nominee agrees. Every effort will be made to contact the parent/s or other person responsible for the student's welfare and reasonable time will be allowed to enable the appropriate adult to be present at the interview. If awaiting the appropriate adult would cause unreasonable delay, and unless the student is suspected of an offence against the academy, the principal or their nominee will act as the appropriate adult for the purposes of the interview.

### Other people using our facilities

Our lettings procedures will seek to ensure the suitability of adults working on academy sites at any time. All users of our facilities must provide written confirmation that they have their own relevant safeguarding policies and procedures, including safer recruitment. In turn we will ensure that they have been issued with our safeguarding policy and have the names and contact details for key personnel within the school including the DSL.

If we receive an allegation relating to an incident that happened regarding a child when an individual or organisation was using our premises (regardless of whether that child is a pupil with us), we will follow our safeguarding policies and procedures, including informing the LADO should this be required.

If our staff or volunteers believe that a child is at risk of harm during a letting, they will make an immediate referral to the school's Designated Safeguarding Lead.

### Alternative provision and work experience

The academy will remain responsible for a student's welfare during their time at an alternative provider. Where students are placed in alternative provision or on work experience, all providers must provide written confirmation that they have their own relevant safeguarding policies and procedures, including safer recruitment.

### Home-stays (Exchange Visits)

Where children from overseas are staying with UK parents as part of an exchange organised by the academy, those parents will be deemed to be in 'Regulated Activity' for the duration of the stay and as such will require to submit an enhanced DBS check including barring check. As a volunteer, all checks will be processed free of charge by the DBS. Where additional people in the host family are aged over 16 (i.e. elder siblings) the academy will consider on a case by case risk assessment basis whether such checks are necessary.

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**Duty to notify Ofsted**

The Academy will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the Academy is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the Academy became aware (or ought reasonably to have become aware) of it.

The Academy will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises whether the allegations relate to harm or abuse committed on the premises or elsewhere.

**Remote education**

Teachers will plan online lessons with the safety of students in mind.

Staff communicating with students or parents via videocall will do so from within the academy, or from a quiet room with a neutral background if working from home.

Teachers will ensure all online planning processes for students who are working online will have clear reporting routes to the academy and external agencies so they can raise concerns whilst online.

The DSL will ensure every student has their contact information so they know how they can contact them about any safeguarding concern.

Students will be provided with online safety information by their teacher.

Students will be directed to practical online support, such as Childline, where they feel unsafe and require support outside of academy.

Parents will be given a list of websites their child may access and any information regarding online sessions with staff that their child will be participating in.

Parents will be provided with the contact details of the DSL so they can report any concerns. When communicating online, staff will:

- Communicate within academy hours as much as possible.
- Communicate through the academy channels approved by the SLT.
- Use academy email accounts over personal accounts wherever possible.
- Use academy devices over personal devices wherever possible.
- Not share personal information.

**12. LINKS TO OTHER POLICIES**

This policy should be read in conjunction with national and local guidance and the following GAET/Academy policies:

- Anti-bullying policy
- Attendance policy
- Behaviour policy
- Curriculum policies including Sex and Relationships Education
- Disciplinary policy (staff)
- Educational visits policy
- ICT and e-safety policy
- Facilities management documentation including lettings arrangements
- Health and safety policy including education off-site and work placements
- Managing allegations against staff policy
- Record keeping policy
- Recruitment policy and Managing Recruitment procedure

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- Staff code of conduct
- Whistleblowing policy

### **Contacts and Advice**

#### **Expert organisations**

- [Barnardo's](#)
- [Lucy Faithfull Foundation](#)
- [NSPCC](#)
- [Rape Crisis](#)
- [University of Bedfordshire: Contextual Safeguarding](#)
- [UK Safer Internet Centre](#)

#### **Support for victims**

- [Anti-Bullying Alliance](#)
- [Ministry of Justice Victim Support](#)
- [Rape Crisis](#)
- [The Survivor's Trust](#)
- [Victim Support](#)

#### **Toolkits**

- [Brook](#)
- [NSPCC](#)
- [Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire](#)

#### **Further information on confidentiality and information sharing**

- [Gillick Competency Fraser Guidelines](#)
- [Government Information Sharing Advice](#)
- [Information Commissioners Office: Education](#)
- [NSPCC: Things to know and consider](#)

#### **Further information on sexting**

- [UK Council for Child Internet Safety Advice: Sexting](#)
- [London Grid for Learning- Collection of advice](#)

#### **Further information on identifying / responding to Child Sexual Abuse**

- [Centre of Expertise on Child Sexual Abuse \(CSA Centre\)](#)

#### **Further information on CSE**

- [Preventing Child Sexual Exploitation](#)

#### **Support for parents**

- [Parentzone](#)
- [Parentsafe – London Grid for Learning](#)
- [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)
- [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)

#### **Online resource offering a confidential chat service to support young people concerned about their own or someone else's sexual thoughts and behaviour**

- [Shore Space](#) (developed in collaboration with the Home Office)

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## Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

- [The Lucy Faithfull Foundation HSB toolkit](#)

## Framework to help schools to review / develop /improve multi-agency responses to children displaying harmful sexual behaviour (HSB).

- [Harmful sexual behaviour framework](#)

### APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All academy staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of academy, from within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

**Abuse:** A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm.

**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 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. Staff are referred to DfE guidance Sexual Violence and Sexual Harassment for further information.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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 (known as child-on-child abuse) is a specific safeguarding issue in education.

**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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on- child abuse, such as bullying (including

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cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

**Child Sexual Exploitation (CSE):** CSE is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage

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or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact: it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity; can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media); can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss academy or education or do not take part in education.

CSE is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking. The DSL or DDSL will consider a referral to the National Referral Mechanism as soon as possible if there are county line concerns, such as a child being a potential victim of modern slavery or human trafficking.

**Child criminal exploitation (CCE):** For the purpose of this policy, "child criminal exploitation" is defined as: where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, for any, or all, of the following reasons: in exchange for something the victim needs or wants; for the financial advantage or other advantage of the perpetrator or facilitator; or through violence or the threat of violence. CCE may be in effect even if the criminal activity appears consensual and can happen through the use of technology.

Some of the following signs may be indicators that a child is the victim of CCE:

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

**County Lines:** refers to organised criminal networks or gangs exploiting children to move drugs and money into one or more areas (within the UK). Drugs and money may also be stored by children for the purpose of criminal activity.

Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL via the usual process. The DSL will consider referral to the National

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Referral Mechanism on a case-by- case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Indicators that a student may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in academy results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863323/HOCCountyLinesGuidance - Sept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCCountyLinesGuidance_-_Sept2018.pdf)

**‘Honour Based’ Violence (HBV):** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing. It can include multiple perpetrators.

**FGM:** is illegal in the UK and is an unacceptable practice. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.

If staff have a concern that a student may be at risk of HBV or has suffered HBV, they should speak to the DSL (or DDSL). As appropriate they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children’s Social Care.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the Academy’s local safeguarding procedures.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. As it also is for anyone to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Academies and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. Academy staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk). Staff can also

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refer to Greater Manchester LSCB guidance [here](#).

**Radicalisation:** refers to the process by which a person legitimises support for, or use of, terrorist violence and extremist ideologies associated with terrorist groups. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces. Terrorism refers to an action that endangers or causes serious violence to a person or people, property, or electronic system, which is designed to influence the government, intimidate the public, or advance a cause.

**Upskirting:** Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

"Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Any incidents of upskirting will be reported to the **DSL** who will then decide on the next steps to take, which may include police involvement.

**Domestic Abuse:** domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological; physical; sexual; financial; and emotional abuse. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

**Homelessness:** Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into children's social care where a child has been harmed or is at risk of harm.

**Mental Health:** All staff will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering abuse, neglect or exploitation. Staff will not attempt to make a diagnosis of mental health problems – the academy will ensure this is done by a trained mental health professional. Where there is a mental health concern about a student that is also a safeguarding concern this will be recorded by staff in line with this policy using CPOMs/MY CONCERN. The academy will access a range of advice to help them identify students in need of additional mental health support, including working with external agencies.

**Fabricated or induced Illness:** Absences from academy can occur in different circumstances including legitimate medical and hospital appointments. Concerns that a child's illness may be fabricated or induced are most likely to come from health professionals. However, any agency in contact with a child may become concerned, for example education staff where a child is frequently absent from academy on questionable health grounds or nursery staff may not observe fits in a child who is described by a parent to be having frequent fits etc. If fabricated or induced illness by a carer is suspected, academies should verify the reasons for the child's absences. They should also determine whether reported illness is being used by the child, for example, to avoid unpopular lessons or being bullied. Such concerns should not be dismissed. In cases of suspected FII, discussing concerns with parents or carers prior to making a referral may place the child at increased risk. It is in the child's best interest that the parents/carers are not informed of the referral at this stage. A multi-agency decision of when and how parents will be informed of

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concerns will be made at a strategy meeting. An Individual Health Care Plan will provide invaluable evidence.

**Child-on-child abuse:** Children can abuse other children. Child-on-child abuse can take many forms and can include (but is not limited to) bullying (including cyberbullying), prejudice-based and discriminatory bullying; sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; consensual and non-consensual sharing of nudes and semi-nudes images and videos (also known as sexting or youth-produced imagery); upskirting; and initiating/hazing type violence and rituals. Girls, students with SEND and LGBT children are more at risk of child-on-child abuse.

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend academy, disengaging from classes or struggling to carry out academy related tasks to the standard ordinarily expected;
- physical injuries;
- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behaviour towards others.

Sexual violence and sexual harassment, as a type of child-on-child abuse, may overlap and can occur online and offline (both physical and verbal). Sexual violence are sexual offences of rape, assault by penetration and sexual assault. Sexual harassment is unwanted conduct of a sexual nature and is likely to violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Examples of sexual harassment include sexual comments sexual "jokes" or taunting; physical behaviour such as deliberately brushing against someone; non-consensual sharing of sexual images and sexualised online bullying.

The initial response to a report of sexual violence or harassment from a child is important. It is essential that all victims are reassured that they will be 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.

If staff have a concern about a child or a child make a report to the, staff should follow the referral process in this policy. If staff are in any doubt about what to do they should speak to the DSL or DDSL.

**Modern slavery:** encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, forced criminality and the removal of organs.

**Cybercrime:** criminal activity committed using computers and/or the internet. It can be categorised as *cyber-enabled* (crime that can happen off-line but are enabled at scale and at speed online) or *cyber-dependent* (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers 'hacking' eg. Accessing a school's computer network – for test paper answers or to change grades;
- denial of service (Dos or DDos) attacks or booting. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets and remote access trojans with the intent to commit further offence.

If there are concerns about a child in this area, the DSL should consider making a referral into the Cyber Choices programme. This is national police programme supported by the Home Office and led by the NCA, working with regional and local policing. Cyber Choices does not currently cover 'cyber-enabled' crime such as: fraud, purchasing illegal drugs online, CSE, nor online bullying or general online safety.

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## APPENDIX 2 - ROLES AND RESPONSIBILITIES

Safeguarding in GAET academies is everyone's responsibility. Everyone who works with students and their families – including academy staff, GPs, nurses, midwives, health visitors, early years professionals, youth workers, police, Accident and Emergency staff, paediatricians, voluntary and community workers and social workers – has a responsibility for keeping them safe. No single professional can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

### GAET

The Trust is responsible for

- ensuring there is a Safeguarding & Child Protection Policy together with a staff behaviour (code of conduct) policy across its academies;
- requiring its academies to use safer recruitment procedures including by ensuring that there is an appropriate policy in place, which lists the checks which must be undertaken on all employees, volunteers and third parties working in the academies, and by requiring there to be at least one person on every recruitment panel that has completed Safer Recruitment training;
- ensuring the Trust has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has already left the Trust's employment;
- nominating a trustee or officer to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against a Principal;
- ensuring the Safeguarding & Child Protection Policy is reviewed annually and that the Safeguarding & Child Protection Policy is available on each academy's website or by other means.
- ensuring that they reasonably limit children's exposure to online risks from the school's or college's IT system. This includes ensuring that systems will be regularly reviewed for their effectiveness.
- ensuring they have considered the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.
- requiring academies to ensure that students are taught about safeguarding, including on-line safety, this may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or through sex and relationship education (SRE).
- ensuring that the chair of trustees completes a suitability check with the ESFA as soon as they are appointed.
- ensuring that enhanced DBS checks are in place for governors;
- providing safeguarding supervision for DSLs
- ensuring any weaknesses in Child Protection are remedied immediately.
- To process a suitability check, the chair of governors will provide the EFSA with:
  - Information about their identity verified by a recognised professional, using the EFSA's [verification form](#).
  - Information confirming their right to work in the UK.
  - The outcome of an enhanced DBS check.
  - An overseas' criminal records check or certificate of good character if they
  - have lived outside of the UK.

### Governing body and Principal

All members of the governing body and the principal understand and fulfil their responsibilities, namely to ensure that:

- the academy operates the Trust's safer recruitment procedures including by ensuring that there is at least one person on every recruitment panel who has completed Safer Recruitment training;
- the Single Central Record is complete and up to date;
- a senior leader has DSL responsibility and arrangements are in place for deputising;

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- the local authority is informed of the named persons with DSL responsibility;
- on appointment, the DSL undertakes interagency training and also undertakes DSL 'new to role' and appropriate updates and other training as recommended by the LSCB, at least annually;
- each Deputy DSL is trained to the same level as the DSL;
- the DSL or a deputy is available to staff at all times during academy hours in term time;
- Ensure the academy has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems.
- all other staff have Safeguarding training updated as appropriate.
- all other relevant staff have received training related to online risks, and how school filtering and monitoring systems support safer use.
- all other staff are aware of the academy's unauthorised absence procedures and children missing education procedures.
- seek assurance from any external provider letting school premises that they have appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensuring that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate.
- the Safeguarding & Child Protection procedures (the academy's appendix to this policy) are reviewed annually.
- consideration is given to how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or through sex and relationship education (SRE).
- Each academy governing body will identify a named governor for safeguarding.

### Designated Safeguarding Lead

The DSL must be a senior leader in the academy. Although an academy may have deputy DSLs, the overall responsibility may not be delegated.

The DSLs are responsible for:

1. Referring a student if there are concerns about possible abuse, to the Local Authority, and acting as a focal point for staff to discuss concerns. Referrals should be made by telephone to the Children's Duty Service and a record of the referral, including the nature of the concern, the date, time and name of referrer should be made and retained in the academy.
2. Act as the main point of contact with the three safeguarding partners and the child death review partner.
3. Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) [guidance](#).
4. Ensure the best educational outcomes by identifying at-risk students to the academy and its staff, so that the relevant personnel understand each student's educational and welfare needs.
5. Support teaching staff to identify the challenges that at-risk students may face and the additional academic support and adjustments they can make to support these students.
6. Keeping written records of concerns about a student even if there is no need to make an immediate referral.
7. Leading on decision-making regarding Early Help.
8. Ensuring that all such records are kept confidentially and securely and are separate from student records, until the student's 25th birthday, or 35th for a student with special educational needs, and are copied on to the student's next academy or college. NB. Until the Independent Enquiry into Child Sexual Abuse has reached its conclusions, child protection records should be retained indefinitely.
9. Ensuring that a record is kept and witnessed of the disposal of individual's records. Files will be destroyed in accordance with data protection and other relevant legislative requirements and in accordance with the policy of the Trust as from time to time implemented.
10. Ensuring Children Looked After records are retained for 99 years.
11. Ensuring that an indication of the existence of the additional file in 3 above is marked on the student records.

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12. Liaising with other agencies and professionals.
13. Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
14. Ensuring that any student currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
15. Organising child protection induction, and update training every 3 years, for all academy staff, and arranging annual safeguarding updates for staff.
16. Taking lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place. They will consider the age range of their pupils and those who are more vulnerable to risk ensuring appropriate intervention.
17. Taking responsibility for any concern raised about a child who has attended school premises as part of a letting to a third party, including contacting the LADO if appropriate.
18. Providing, with the principal, an annual report for the governing body, detailing any changes to the academy's procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of students subject to child protection plans (anonymised).

### **Other Academy staff**

It is the responsibility of all academy staff to work within this policy and related procedures. In particular, all staff should be aware of how to identify and report concerns and how to support students who are at risk. All staff will participate in training as required. Each academy should determine the level of training required for individual staff members, based on their roles. All staff are required to read Part 1 of DfE guidance Keeping Children Safe in Education 2025 and those who work directly with children Annex A and to sign to confirm that have done this.

All staff must:

- Read the safeguarding policy and understand the academy's procedures (Academy appendix);
- know who the DSL and any deputies are in the academy;
- report all safeguarding concerns immediately to the DSL and understand who needs to be involved if a student tells them he/she is being abused or neglected (The data Protection Act 2018 and the GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe);
- receive appropriate safeguarding training that is regularly updated;
- receive safeguarding updates at least annually;
- understand the difference between a 'concern' about a child and a child 'in immediate danger or at risk of harm', and what they should do in either case;
- be aware of the early help process and be prepared to identify students who may benefit from early help;
- be aware of the process for making referrals to children's social care and the statutory assessment process under the Children Act 1989;
- record all safeguarding concerns, discussions and decisions in writing;
- understand the academy's behaviour procedures;
- be aware that students with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of students.
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Students with SEND can be disproportionally impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist with students with SEND, as well as difficulties in overcoming these barriers
- be aware of the safeguarding risks associated with pupils being absent from school, and how to respond if they suspect a student may be missing from education.
- be alert to information which suggests that a child may be being privately fostered (living with someone other than a person with parental responsibility) and inform the DSL who will inform the LA.
- be aware of issues relating to online safety which, amongst other things, includes an understanding of the

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expectations, applicable roles and responsibilities in relation to filtering and monitoring.

In addition, all teaching staff must understand their legal duty to act in respect of any concerns about FGM.

Staff with responsibility for academy admissions should ensure there is more than one emergency contact number for each student.

Staff with responsibility for educational visits involving homestays should be aware of the relevant guidance within KCSIE 2025.

#### **Parents/carers**

- Parents/carers are made aware of this policy, including through its publication on each academy's website.
- Parents views are sought on how safe they feel their children are in the academy, including through questionnaires
- Any parent reporting concerns about the welfare of a child can expect to have their concerns taken seriously and to be confident that the concerns will be acted upon.
- Parents whose children are at risk (including those parents who may be putting their own children at risk by virtue of their actions or inaction) will be treated with respect and will be involved in the provision for their children. NB See specific guidance regarding children having Illness Fabricated or Induced (FII) by their carer, appendix 2.

#### **Students**

- Students are made aware of how to raise concerns about their own welfare and that of other children.
- Any student reporting concerns about the welfare of a child can expect to have their concerns taken seriously and to be confident that the concerns will be acted upon.
- Children who are at risk will be treated with respect and will be involved in decisions about the provision for them.

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**APPENDIX 3: LOCALISED APPENDIX****KEY EXTERNAL CONTACT DETAILS**

<b>Local Authority Designated Officer:</b>	Tameside LA	Rochdale LA
	NAME: Laurie Warburg TEL: 0161 342 2245 EMAIL: <a href="mailto:ladoreferrals@tameside.gov.uk">ladoreferrals@tameside.gov.uk</a>	NAME: Louise Hurst & Kirsty Beagin (each is part time) EMAIL: <a href="mailto:lado@rochdale.gov.uk">lado@rochdale.gov.uk</a>
<b>Local Authority Children's Social Services</b>	Tameside LA	Rochdale LA
	Name: Tameside CSC – Public Service Hub TEL: 0161 342 4101 EMAIL: Use the contact form on the CSC website OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0161 342 2222	Telephone 0300 303 0440 Office hours 0300 303 8875 Out of office hours E-mail ehash@rochdale.gov.uk
<b>Multi-Agency Safeguarding Hub</b>	TEL: As above EMAIL: As above	
<b>Support and Advice about Extremism</b>	<b>Police</b> TEL: 0161 234 1489 EMERGENCY: 999 NON EMERGENCY NUMBER: 101  <b>Department for Education</b> NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>	
<b>NSPCC whistleblowing advice line</b>	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	
<b>Disclosure and Barring Service</b>	ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a>	
<b>Teaching Regulation Agency</b>	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>	
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>	

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## KEY ACADEMY CONTACT DETAILS

Academy Name	SILVER SPRINGS PRIMARY ACADEMY
Great Academies Education Trust (GAET)	<p><b>Chair of GAET</b> NAME: Paul Jones EMAIL: <a href="mailto:governance@gaet.co.uk">governance@gaet.co.uk</a></p> <p><b>Safeguarding Trustee</b> NAME: Barbara Daykin EMAIL: <a href="mailto:governance@gaet.co.uk">governance@gaet.co.uk</a></p> <p><b>Trust DSL</b> NAME: Gary Miller EMAIL: EMAIL: <a href="mailto:gmliller@gaet.co.uk">gmliller@gaet.co.uk</a></p>
Local Governing Committee (LGC)	<p><b>Chair of LGC:</b> NAME: Claire Ferguson TEL: 0161 338 2475 EMAIL: <a href="mailto:governance@gaet.co.uk">governance@gaet.co.uk</a></p> <p><b>Nominated Safeguarding Governor of LGC</b> NAME: Pat Broadley TEL: 0161 338 2475 EMAIL: <a href="mailto:governance@gaet.co.uk">governance@gaet.co.uk</a></p> <p><b>Nominated E-Safety Governor of LGC</b> NAME: Pat Broadley TEL: 01613382475 EMAIL: As above</p>
Designated Safeguarding Lead (DSL)	<p><b>Main DSL for the Academy</b> NAME: Ms Carolyn Hadfield TEL: 0161 338 2475 EMAIL: <a href="mailto:safeguarding@silverspringsacademy.org.uk">safeguarding@silverspringsacademy.org.uk</a></p>
Designated Teachers for Looked After Children	<p>NAME: Mrs O Hardy TEL: 0161 3382475 EMAIL <a href="mailto:admin@silverspringsacademy.org.uk">admin@silverspringsacademy.org.uk</a></p>
Head/Principal	<p>NAME: Mrs D Mason TEL: 0161 338 2475 EMAIL: <a href="mailto:admin@silverspringsacademy.org.uk">admin@silverspringsacademy.org.uk</a></p>

## Arrangements for deputising

In the absence of the DSL:

- **Deputy DSL:** Mrs Hardy, Mrs Mason, **Mrs Hmami, Mrs McHugh**

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**Induction and training information:**

When a new staff member commences employment at the Academy, a member of the Senior Leadership Team will meet with the new staff member to check that the induction has been carried out and safeguarding information shared in line with the academy's induction checklist.

Safeguarding training information is logged and recorded centrally, and the DSL ensures that all staff undertake regular statutory and advised training, based on Keeping Children Safe in Education 2025. Both teaching and

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support staff are also asked to complete online level 2 safeguarding training. This includes training on the following areas; Safeguarding Children (KCSIE 2025), Prevent, Mental Health and Online Safety. Staff who are absent are followed up by the DSL to ensure that they have completed the appropriate training.

Safeguarding Training Log – Academic Year 2024-26		
Attendees	Types of training provided	Date undertaken
Principal/Headteacher	Annual safeguarding update & KCSIE Prevent Level 2 safeguarding training DSL Refresher Protect UK Counter terrorism training for schools Sexual Harassment in the workplace CSE Cyber Security Training Health and Safety Training	September 2025  November 2025 December 2024 September 2025 July 2024 July 2024 September 2025 September 2024
DSL	Annual safeguarding update & KCSIE Trauma informed practice Prevent Protect UK Counter terrorism training for schools Sexual Harassment in the workplace CSE Cyber Security Training Health and Safety Training FGM refresher Levels 3 safeguarding training Designated Teacher for CLA	September 2025
DDSL	Annual safeguarding update & KCSIE Level 2 & 3 safeguarding training DSL training ICPC Training Protect UK Counter Terrorism Training Cyber Security Training FGM Refresher Sexual Harassment in the Workplace FGM refresher	September 2025  December 2025 September 2025

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	E Safety Adverse Childhood Experiences Forced Marriage Safer Recruitment Child on Child abuse County Lines refresher Domestic Abuse	Jan 2026 Jan 2026 Jan 2026
Senior Leadership Team	Annual safeguarding update & KCSIE Level 2 safeguarding training Protect UK Counter Terrorism Training Cyber Security Training FGM Refresher Sexual Harassment in the Workplace	September 2025
Whole Academy	Annual safeguarding update & KCSIE Level 2 safeguarding training Protect UK Counter Terrorism Training Cyber Security Training FGM Refresher Sexual Harassment in the Workplace	September 2025

Chair of Governors of LGC	Governor Safeguarding & KCSIE	October 2025
Nominated Safeguarding Governor	Governor Safeguarding & KCSIE	October 2025

### **Raising safeguarding concerns**

Any disclosures made to any member of staff by a student must be reported to the DSL or DDSL/SLT in their absence. For academy staff this is done by logging an incident on CPOMs (electronic safeguarding software); or, in some cases and for visitors, in person or in writing to DSL. The DSL will take appropriate action and arrange for contact to be to the appropriate e.g. LA Children's Social Care (MASH) as appropriate. Using either of the recording methods above does not replace a face-to-face conversation with the DSL which should be done as a priority.

Referrals to the Hub are made by the completion of a MARS (Multi-Agency Referral to Services) via the online electronic referral form. These are recorded by the DSL/safeguarding member of staff on CPOMs and any actions/outcomes are noted on CPOMs for the student.

### **Completion, maintenance and storage of records**

Child Protection records which are historical are kept in a safe locked filing cabinet in a secure room. All current CP records are scanned into CPOMs and stored in the student's online document vault. All cause for concern sheets are kept for checking by DSL; these are viewed by the DSL or DDSL, then scanned into CPOMS for action and kept in the student's online document vault.

If a student moves to another academy or the records are requested by an external agency i.e. the Police, A COPY of the records are transferred (the receiving academy or external agency must sign for these documents) and discussion with the academy takes place regarding concerns within the time frame of 5 academic days. The academy retains the main copy in line with GDPR regulations.

All students, for whom there are child protection concerns, have an ongoing chronology e-document on CPOMs (which has restricted access); this also forms part of a student's records and are transferred as above.

### **Support mechanisms for students**

Each student attending the academy has a class teacher and each class has some classroom based support staff time according to priority needs. It is made aware to all students, that they can speak to any of these staff if they have any concerns. There is also an Emotional Literacy Support Assistant (ELSA) and other trained safeguarding staff in the Academy, and these are pointed out to all students, should they wish to raise a worry or concern with them.

All teachers complete check ins with eh children at the start of the school day and again in the afternoon during registration. The ELSA delivers a range of interventions including those for whole classes, groups and individuals. The school employs a play therapist who is able to provide therapeutic play sessions to individuals and groups. Staff can refer children for support to these services. The school uses Zones of regulation to support children's self regulation and emotional literacy – these are visited often throughout the day and in assemblies.

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Several staff have also undergone training to be mental health ambassadors and mental health lead training and the academy engages counsellors and other external agencies in support of students in need. Support also comes from Tameside's Mental Health Support Team (MHST). The DSL meets and works with students when the need arises or if the Safeguarding /pastoral team has any further concerns. Referral to external agencies in respect of safeguarding concerns is undertaken by a member of the safeguarding team as appropriate.

### **Contextual Risks**

Students attending Silver Springs are known to live in the surrounding areas of Stalybridge, Ashton, Dukinfield and Mossley and the wider Tameside area. The Academy recognises that any student can fall victim to external factors and staff are trained to understand that incidents that put students at risk can and do happen within these communities. Although training reflects specific concerns, the Academy is aware there is not an exhaustive list of risks to young people attending.

### **How the curriculum promotes safeguarding**

The academy's approach to safeguarding in the curriculum is a calculated mixture of proactive and reactive measures. Although there is a proactive approach to some of the concerns that have arisen locally and nationally, there is often still a need to sometimes be reactive to the issues that occur.

The academy has adopted the SCARF Curriculum to deliver PSHE lessons to all children in all key stages. See PSHE Curriculum for further information. These topics are also addressed through assemblies. Further enrichment opportunities are provided to children in Year Six in the form of Safe Squad, Knife Crime Presentation, Fire Safety and so on. Children are also signposted to Childline by posters located around the Academy. The SRE curriculum is woven into the PSHE Curriculum for all year groups.

### **E-Safety in the Digital Literacy Curriculum**

All students attending the academy have to read with their teacher or a parent and agree to an e-safety agreement to comply with school expectations. Further to this the academy employs Smoothwall as its filtering and monitoring software on devices both within the academy and those being used at home. This software flags up harmful content and inappropriate material reviewed by staff and students using school systems. This notifies the DSL, DDSL and Pastoral Team if triggered.

The Academy provides guidance in line with the GAET E-safety policy, which is included as units of work within the ICT Curriculum and makes use of resources including Internet Legends.

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