Child Protection (Safeguarding) Policy

Policy Details	
Policy Title:	Child Protection (Safeguarding)
Last amendment date:	July 2026
Owner:	Senior Director: School Improvement
Approved by:	Trust Board
Next review date:	July 2027

Contents

Contents 1
1. Rationale and Scope 3
2. Aims 3
3. Important contacts 4
4. Legislation and statutory guidance 5
5. Definitions 6
6. Equity, Equality, Diversity and Inclusion Statement 7
7. Roles and Responsibilities 7
8. Confidentiality 10
9. Recognising abuse and taking action 10
10. Online safety, AI and the use of mobile technologies 21
11. Notifying Parents and Guardians 23
12. Pupils with Special Educational Needs, Disabilities, or health issues 23
13. Pupils with a social worker 23
14. Looked after, and previously looked after, children 24
15. Gender-Questioning Children 25
16. Complaints and concerns about academy safeguarding policies 25
17. Record Keeping 25
18. Training 26
19. Site Security 27
20. Monitoring and reporting arrangements 28
21. Links to other policies 29

Appendix A: Types of abuse 30
Appendix B: Action when a child has suffered or is likely to suffer harm 32
Appendix C: Safer Recruitment 33
Appendix D: Allegations of abuse made against staff 35
Appendix E: Alternative Provision 43
Appendix F: Further information 43
Appendix G: Local Context and Contacts 53
Appendix H: Safeguarding contacts poster 54

1. Rationale and Scope

All pupils including those at post 16 deserve the opportunity to achieve their full potential. They are only able to achieve this if they live in a safe environment and are protected from harm. In recognising this, the Haberdashers' Academies Trust South (The "Trust") has procedures of which all staff should be aware for the protection of pupils and thehandling of suspected cases of the abuse of pupils. These include procedures to be followed if a member of staff is accused of abuse.

This is a statutory requirement, applicable to all academies within the Trust, to ensure that pupils and staff aresafe and understand their responsibility in child protection. To ensure that we deliver against our values, and to comply with the statutory Keeping Children Safe in Education 2026 guidance, the Trust has implemented this Child Protection Policy.

This policy applies throughout the Trust, including all students and all staff in each academy and in the central teams.

This policy should be read in conjunction with the following policies: Culture for Learning; Anti-Bullying; Attendance; Exclusions; Online Safety; Use of Mobile Phones and Mobile Technologies; Data Protection; SEND; RSE; Staff Code of Conduct; Recruitment and Selection; Acceptable Use of ICT – Staff, Students, Guests; Photo and Video; Health and Safety; Visitors; Early Years Foundation Stage.

2. Aims

The aims of this Policy are:

- To ensure that all staff and Governors within the Trust understand they have a duty to keep pupils safe and promote their mental and physical wellbeing and welfare, including:
    a) awareness of the indicators of abuse and neglect, including peer on peer abuse;
    b) being alert to children who may benefit from Early Help;
    c) identifying pupils who may be vulnerable to radicalisation;
    d) following correct safeguarding procedures, including referrals;
    e) knowing to whom they should report any safeguarding concerns (the Designated Safeguarding Lead – see Appendix A);
    f) understanding reporting and monitoring arrangements, including those linked to cyber-security.
- To promote the duty laid upon the Governors of the Trust pursuant to Section 175(1) Education Act 2002,that is; "[the]governing bodies…shall make arrangements for ensuring that the functions conferred on them are exercised with a view to safeguarding and promoting the welfare of pupil."
- To ensure that anyone connected to the academy, including parents and guardians, know whom to contact at the relevant academy if they have a concern about a child protection issue.

3. Important contacts

The Designated Safeguarding Lead (DSL) at each academy takes responsibility for managing child protection referrals, safeguarding training and raising awareness of child protection policies and procedures. The DSL should be the first point of contact for any safeguarding query. All DSLs can be contacted by email or by calling the school office. In some limited situations, which are described in the following sections (e.g. if there is a safeguarding concern about the DSL), it may be appropriate to contact the CEO or the designated safeguarding governor for a school.

Role	Name / Organisation	Contact details
Designated Safeguarding Lead (DSL)	T. Allmark	t.allmark@habstrustsouth.org.uk
Deputy DSL's	G. Gibson C. Thomas J. Clark C. Frampton	g.gibson@habstrustsouth.org.uk c.thomas@habstrustsouth.org.uk j.clark@habstrustsouth.org.uk c.frampton@habstrustsouth.org.uk
Local Authority Designated Officer	M. Bradshaw	Morgan.bradshaw@lewisham.gov.uk
Chair of Governors	S. Masterson	Simon.masterson@energysecurity.gov.uk
Principal	G. Gibson	g.gibson@habstrustsouth.org.uk
School contact number	N/A	02084619249 07703835474
CEO	J.Shadick	j.shadick@habstrustsouth.org.uk
Trust Safeguarding Lead	S.Mitchell	s.mitchell@habstrustsouth.org.uk
Safeguarding Trustee	A.Adetsoye	a.adetsoye@governors.haaf.org.uk
DSL Borough Academy	C. Holness	c.holness@habstrustsouth.org.uk
DSL Crayford Academy	K. Atwell	k.atwell@habstrustsouth.org.uk
DSL Hatcham College	M Kemp	hatchamsafeguarding@haaf.org.uk
DSL Knights Academy	C. Ponteen	Safeguarding.knights@habstrustsouth.org.uk
DSL Crayford Primary	K. Ellis	k.ellis@habstrustsouth.org.uk

DSL Hatcham Free School	J. Jaeger	k.ransom@habstrustsouth.org.uk
DSL Hatcham Primary	E. Gyimah	m.mcdonald@habstrustsouth.org.uk
DSL Knights Primary	T. Allmark	t.allmark@habstrustsouth.org.uk
DSL Slade Green Primary	J. Mintram	j.mintram@habstrustsouth.org.uk
Channel helpline		020 7340 7264

4. Legislation and statutory guidance

Section 175 of the Education Act 2002 places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the school.

This policy is based on the Department for Education's statutory guidance and Working Together to Safeguard Children (2026), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local Safeguarding Partners (defined in 5 below).

Our academies work according to the following legislation and guidance:

- Children's Act 1989 & 2004
- Keeping Children Safe in Education (DfE 2026)
- Working Together to Safeguard Children (HMG July 2018, updated 2026)
- Working together to improve school attendance (DfE, September 2024, updated 2026)
- Behaviour in schools (DfE, September 2022)
- Children Missing in Education (DfE 2016, updated 2024)
- Keeping children safe in out of school settings (DfE October 2020, updated 2025)
- Sharing nudes and semi-nudes: How to respond to an incident (UKCIS 2020, updated 2024)
- Counter-Terrorism and Security Act 2015 (Home Office 2015)
- Serious Crime Act 2015 (Home Office 2015)
- Prevent Duty Guidance: England and Wales 2015 (HMG 2015, updated 2024)
- The Prevent Duty – Safeguarding Learners vulnerable to radicalisation (DfE 2022, updated 2023)
- Forced Marriage guidance (GOV.UK March 2013, updated 2023)
- What to do if you're worried a child is being abused: Advice for practitioners (HMG 2015)
- Child Sexual Exploitation: Definition and a guide for practitioners (DfE 2017)
- Information sharing advice for safeguarding practitioners (DfE 2018, updated 2024)
- Multi-agency practice guidelines: Handling cases of Forced Marriage (HMG 2014)
- Multi-agency statutory guidance on female genital mutilation (Home Office 2016, updated 2020)
- Mental Health and Behaviour in Schools (DfE 2018)
- When to call the police (NPCC, 2020)
- Safeguarding and remote education (DfE 2020, updated 2022)
- Use of reasonable force in schools (DfE 2013, updated 2026)
- Alternative Provision: Statutory Guidance for Local Authorities (DfE 2013, updated 2025)
- SEND Code of Practice (DfE & DoH 2015, updated 2025)
- Data Protection Act 2018

- Disqualification under the Childcare Act 2018
- Education Act 2011
- Sexual Offences Act 2003
- Crime and Policing Act (2026)
- Meeting digital and technology standards in schools and colleges (DfE, March 2022, updated 2026)
- Cyber security standards for schools and colleges (DfE, March 2022, updated 2026)
- Using AI in education: support for school and college leaders (DfE, June 2025, updated 2026)
- Online Safety Act Explainer (DSIT, April 2025)
- Professional Guides: Understanding and Responding to AI-Generated Child Sexual Abuse Material (IWF, 2025)Early Years Foundation Stage Statutory Framework (September 2026)

This policy also complies with our funding agreement and articles of association.

5. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse. Abuse can take place wholly online, or technology may be used to facilitate offline abuse, and children may also cause harm to other family members (child-to-parent or care-giver abuse).

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing of nudes and semi-nudes is where children make and / or share nude or semi-nude images, videos or live streams, including those generated using AI.

Children includes everyone under the age of 18.

Key Person within Early Years Foundation Stage, a key person has special responsibilities for supporting a specific group of pupils and building relationships with them and their families.

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

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

6. Equity, Equality, Diversity and Inclusion Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Are lesbian, gay or bisexual, or are questioning their gender;
- Are at risk of modern slavery, human trafficking, or other forms of extra-familial harm;
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers or refugees
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education, home or care
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- Are persistently absent from education, including persistent absences for part of the school day.
- Have experienced multiple suspensions, and / or are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.

We recognise the need to eliminate unlawful behaviours that relate to protected characteristics, including sexual violence and sexual harassment, misogyny/misandry, racism, homophobia and faith-based prejudice.

7. Roles and Responsibilities

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

7.1 All staff

All staff must read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. All staff must sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff must be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, online safety policy, acceptable use of IT policy, filtering and monitoring systems and the safeguarding response to children who go missing from education;
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment;
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- What to do if they identify a safeguarding issue or a child tells them they are being abused, exploited or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation;
- That children may experience prejudice-based harm, including faith-based harm, racism and other forms of discrimination, and
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

Section 17 and Appendices A and B of this policy outline in more detail how staff are supported to do this.

7.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Trevor Allmark, Head of School. The DSL takes lead responsibility for child protection and wider safeguarding in the academy, including online safety and understanding the filtering and monitoring processes in place. During term time, the DSL will be available during academy hours for staff to discuss any safeguarding concerns.

When the DSL is absent, the Deputy DSLs, Christina Thomas, Clarry Frampton and Jodie Clark will act as cover.

If the DSL and deputies are not available, Graham Gibson the Executive Principal will act as cover (for example, during out-of-hours/out-of-term activities).

Outside term time, each academy will have a dedicated safeguarding email address where concerns can be reported. This will be monitored regularly by a member of the safeguarding team.

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

- Provide advice and support to other staff on child welfare and child protection matters;
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police) and support staff who make such referrals directly;
- Ensure they are satisfied that any Alternative Provision settings used for pupil placements meet safeguarding requirements (See Appendix E);

- Ensure they are satisfied that systems and processes for filtering and monitoring, and ensuring online safety, meet safeguarding requirements.

The DSL will also keep the Principal informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL and deputy/deputies are set out in their job descriptions.

Serious safeguarding incidents must be reported immediately to the Trust Safeguarding Lead and CEO. Serious online safety incidents (Level 5) must be reported to the Trust Safeguarding Lead, with a summary of actions taken and outcomes.

7.3 Trustees and Local Governing Bodies

Trustees should:

- Evaluate and approve this policy at each review, ensuring it complies with the law;
- Appoint a Trustee to monitor the effectiveness of this policy in conjunction with the Trust Board;
- The CEO will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate (see Appendix D)

Local Governing Bodies must:

- Facilitate a culture of safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development;
- Hold the Principal to account for the policy's implementation; and
- Appoint a Safeguarding Governor to monitor the effectiveness of the policy and to support and challenge the work of the DSL.

All Trustees and Governors must read Keeping Children Safe in Education.

Section 17 of this policy has information on how governors are supported to fulfil their role.

7.4 The Principal

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

- Communicating this policy to parents/guardians when their child joins the academy and via the academy website;
- Ensuring that the DSL has appropriate time, funding, training and resources and that there is adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training, including online safety, and update the content of the training regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3);
- Ensuring the relevant staffing ratios are met, where applicable (primary only);
- Making sure each child in the Early Years Foundation Stage is assigned a Key Person (primary only).

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand the filtering and monitoring systems that are in place to ensure pupils stay safe online
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

8. Confidentiality

Staff and volunteers may in the course of their duty obtain information which is confidential. They must not pass on any information received or obtained through their employment to anyone who is not entitled to have that information. Staff must follow the Trust Data Protection Policy.

Confidentiality for the purpose of this policy relates to any information, including sensitive or private information, given to adults concerning children in their care or prospective children in their care or in the care of Haberdashers' Academies Trust South, and / or any personal or sensitive information, especially information raising child protection concerns, shared by children with an adult.

It should be noted that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's Information sharing advice for Safeguarding Practitioners https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice includes 7 'golden rules' for sharing information, and provides guidance to support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 16 and allegations of abuse against staff in appendix D

9. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

Make a referral to Children's Social Care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly (see section 7.2). To make a referral to the Lewisham families first contact point (FFCP) you should use the link provided on the keeping children safe from harm page of the council's website.

Lewisham FFCP referral link: Lewisham Council - How to refer a child or young person you are worried about, for protection

If the referral is urgent and outside normal working hours (9am to 5pm Monday to Friday) you should contact the out of hours team on 02083146660. If a child is in imminent danger, contact the police immediately by calling 999.

Reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

9.2 If a child makes a disclosure to you

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

- Listen and take their concerns seriously. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to Children's Social Care and/or the police directly (see 9.1) and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix E of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

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

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

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

Any member of staff who suspects that a pupil is at risk of FGM, suspects that FGM has been carried out, or discovers that a **pupil aged 18 or over** appears to have been a victim of FGM must immediately inform the Designated Safeguarding Lead (DSL) and record the concern on CPOMS. Staff must not examine the pupil. Where a girl under the age of 18 discloses that she has undergone FGM, or a teacher observes physical signs that FGM appears to have been carried out, the teacher must make a report to the police via 101 as soon as possible, ideally on the same working day, in line with the mandatory reporting duty. The DSL must be informed immediately afterwards. The DSL will make a referral to Children's Social Care, seek advice from the NSPCC where appropriate, and ensure that all actions and decisions are recorded. Where there is concern that a child is at risk of FGM, staff should report the concern via CPOMS in the usual way and the DSL will take appropriate safeguarding action, including referral to FFCP where necessary. If there is concern that a child has been taken abroad for the purpose of FGM, the safeguarding team will also contact the Lewisham Social Care team and the Foreign, Commonwealth and Development Office.

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

Figure 1 below, before section 9.7, illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action.

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

Make a referral to local authority Children's Social Care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help and Family Help

Early Help is a proactive approach aimed at supporting children, young people and families to prevent issues from becoming acute or chronic through timely, targeted support. It is delivered through universal services (e.g. schools or children's centres) and targeted multi-agency interventions.

Family Help (coordinated by the local authority and / or partners) combines early help with statutory provision under a broader, integrated framework.

The DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate in line with the local safeguarding partners' published criteria. Staff may be required to support other agencies and professionals in an early or family help assessment, in some cases acting as the lead practitioner.

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

At Knights Primary School, all concerns should be recorded on CPOMS and discussed with the DSL. Where a child's needs are emerging and do not meet the threshold for statutory intervention, the DSL will consider whether an Early Help referral is appropriate. The DSL will liaise with parents/carers, relevant school staff and external agencies to identify and coordinate support. Staff may be required to contribute to Early Help assessments, attend Team Around the Family (TAF) meetings and provide regular updates on the child's progress. Where concerns escalate or the child's needs are not being met through Early Help, the DSL will make a referral to Children's Social Care in line with local authority threshold guidance.

The academy follows the local authority Continuum of Need guidance when considering referrals and assessing levels of support. Parental consent will normally be sought before making an Early Help referral unless doing so would place the child at further risk of harm.

Referral

If it is appropriate to refer the case to local authority Children's Social Care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 9.1) you must tell the DSL as soon as possible.

The local authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. **The DSL or person who made the referral must follow up with the local authority if this information is not made available and ensure outcomes are properly recorded.**

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. If the response to a referral is not considered adequate, or if the child's circumstances do not improve, the DSL will follow the Lewisham Safeguarding Children Partnership escalation procedures and challenge decisions where necessary to ensure that the child's welfare and safety remain paramount.

9.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority Children's Social

Care. Make a referral to local authority Children's Social Care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practical after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority Children's Social Care team.

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

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

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

9.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. These can include, but are not limited to:

- Emotional state (fearful, withdrawn, low self-esteem)
- Behaviour (aggressive or oppositional; habitual body rocking)
- Interpersonal behaviours (indiscriminate contact or affection seeking, demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour)

Sometimes mental health problems can feel overwhelming for children and young people. If a child talks about wanting to hurt or harm themselves, or expresses suicidal feelings, they should always be taken seriously.

Signs that a child or young person may be having suicidal feelings or thinking about suicide include:

- Becoming more depressed or withdrawn, spending a lot of time by themselves
- An increase in dangerous behaviours like taking drugs or drinking alcohol
- Becoming obsessed with ideas of suicide, death or dying, which could include internet searches
- Saying things like "I'd be better off dead", "No one would miss me", "I just wish I wasn't here anymore".

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 9.4. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; staff are, however, well placed to notice changes in behaviour that may indicate a child is experiencing a mental health problem or is at risk of developing one, and should share these observations with the DSL. If a child needs urgent help for their mental health but it is not an emergency, staff can contact NHS 111 (selecting the mental health option) or use 111 online, in addition to following the academy's own pastoral and safeguarding routes.

Key roles for schools in supporting good mental health include:

- promoting good mental wellbeing;
- observing pupils and identifying early those who may be experiencing mental health issues, or at risk of developing them;
- ensuring early targeted support is provided;
- referring / liaising with specialist services as needed.

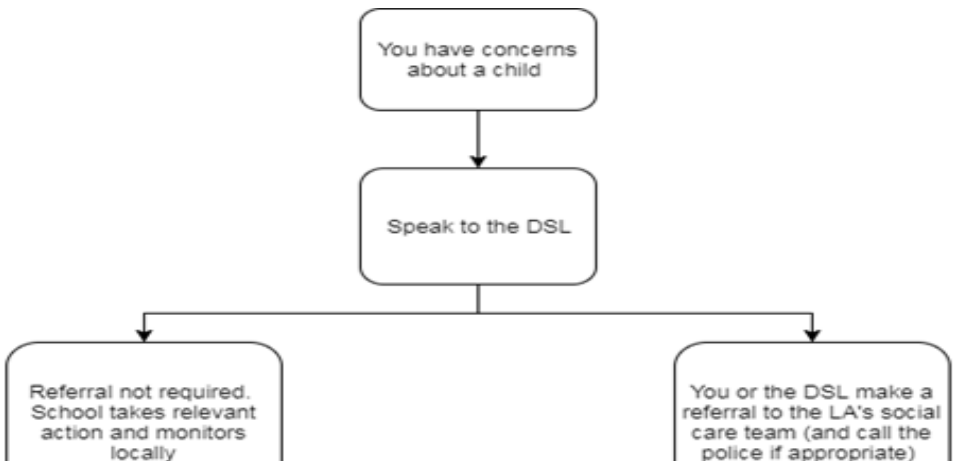
The school uses a graduated approach to supporting pupils' mental health. Initial concerns may be addressed through pastoral support (our ELSA Christina Thomas), restorative conversations, mentoring, nurture provision, emotional literacy interventions, Zones of Regulation strategies, and engagement with parents/carers. Class teachers remain responsible for monitoring the wellbeing of pupils in their care and working closely with pastoral and safeguarding staff.

Where concerns are more significant or persistent, the DSL and pastoral team will coordinate additional support and consider referrals to appropriate services. This may include Early Help, the school nursing service, educational psychology, CAMHS, NHS Mental Health Support Teams, Children's Social Care or other specialist agencies. Parents/carers will normally be involved in discussions and referrals unless doing so would place the child at increased risk of harm.

The DSL maintains oversight of all pupils receiving mental health support and ensures that actions, interventions and outcomes are recorded on CPOMS. Cases are reviewed regularly through safeguarding and pastoral meetings to ensure that support remains appropriate and effective. Where a pupil is considered to be at immediate risk of harm to themselves or others, safeguarding procedures will be followed and emergency services or specialist mental health services contacted as appropriate.

Mental health concerns do not automatically mean that a child is at risk of harm; however, staff should be aware that mental health difficulties can be an indicator of abuse, neglect, exploitation or other safeguarding concerns. Where this is suspected, the academy's child protection procedures will be followed.

Figure 1: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering from or likely to suffer from, harm, or in immediate danger).



9.7 Concerns about a staff member, supply teacher, trainee teacher, volunteer, visitor or contractor working in the academy

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

The Principal / CEO will then follow the procedures set out in appendix D, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

9.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh", "boys being boys" or "part of growing up", as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. All child-on-child abuse (including harassment and violence) is unacceptable and will be taken seriously. Discriminatory behaviour includes racism, faith-based abuse and other prejudice-based incidents.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the academy at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
  Involves misogyny, sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix E for more information about child-on-child abuse.

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

Responding to a report

- All victims should be 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.
- Where possible, reports should be managed with two members of staff present, one being the designated safeguarding lead or a deputy. However, this might not always be possible.
- Where the report includes an online element, staff should not view or forward illegal images of a child. In such instances, devices should be confiscated and handed to the police for inspection.
- The academy's reporting and safeguarding procedures should be followed, as per Appendix D.

Risk assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

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

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the academy or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

The DSL (or a deputy) should ensure they are engaging with children's social care and specialist services as required. The above academy or college risk assessment is not intended to replace the detailed assessments of expert professionals.

In the rare circumstances where a temporary safeguarding separation arrangement may be required, schools must follow the guidance outlined in the Exclusions Policy.

Safeguarding and supporting the victim

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the academy or college is a safe space for them.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Academies and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

- Consider the proportionality of the response. Support should be tailored on a case-by-case basis.

- It may be necessary for academies and colleges to maintain arrangements to protect and support the victim for a long time. Academies and colleges should be prepared for this and should work with children's social care and other agencies as required.

Safeguarding and supporting the alleged perpetrator

- The academy or college will have a difficult balancing act to consider. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary;
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them;
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from local authority children's social care, specialist sexual violence services and the police;

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, misogyny/misandry and / or sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 9.10 below)
- Ensure staff reassure victims that they are being taken seriously

We will ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

9.9 Sharing of nudes and semi-nudes

This approach is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders. Further information about the Trust approach to AI-generated images can be found in the Acceptable Use of IT policy.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual making and / or sharing of nude or semi-nude images/videos, including those generated by AI, you must report it to the DSL immediately.

You must **not**:

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

Initial review meeting

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

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

- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or guardians of the pupils involved (in most cases parents/guardians should be involved)

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

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

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

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/guardians

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done by informing the school's police liaison officer.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 16 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes, at an age-appropriate level:

- What it is
- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation
- Pupils also learn the strategies and skills needed to manage:
- The receipt of such images
- Safe and respectful online behaviour and communication.
- Personal privacy, boundaries and consent.
- Peer pressure, online influences and making safe choices.
- How digital content can be copied, shared and distributed without permission.
- How to report concerns and seek support from trusted adults.

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

9.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

At Knights Primary School, pupils are encouraged to speak to any trusted adult if they have a concern or are worried about themselves or another child. This may include their class teacher, teaching assistant, phase leader, pastoral team member or a member of the safeguarding team.

We ensure pupils understand how to report concerns through our PSHE and Relationships Education curriculum, assemblies, safeguarding lessons and regular reminders from staff. Safeguarding posters around the school identify members of the safeguarding team and explain how pupils can seek help.

All concerns raised by pupils are taken seriously. Staff listen carefully, act on concerns promptly and reassure pupils that they have done the right thing by speaking up. Pupils are supported throughout the process and are kept informed, where appropriate, about what will happen next. Our aim is to create a culture where every child feels safe, valued and confident that their voice will be heard.

10. Online safety, AI and the use of mobile technologies

The breadth of online safety issues is considerable, and ever-evolving. Risks are categorised into four areas which form the basis of our approach.

- Content: being exposed to illegal, inappropriate or harmful content (for example pornography, racism, misogyny, self-harm, suicide, radicalisation, extremism, or misinformation and disinformation).
- Contact: being subjected to harmful online interaction with other users, including adults posing as children to groom or exploit them, or generative AI applications that simulate this.
- Conduct: online behaviour that increases the likelihood of, or causes, harm, such as making, sending or receiving explicit images (including those generated using AI) and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and financial scams.

Our academies operate as mobile phone-free environments by default. Full details of how each academy achieves this are set out in individual school Mobile Phone Policies.

Where staff have concerns about a child relating to online safety, including cybercrime, they must follow the reporting procedures outlined in Section 9 of this policy.

10.1 Filtering and Monitoring

The Trust Smoothwall system monitors online activity when working on an academy device or connected to an academy system. Online safeguarding alerts are sent to the DSL, Trust Safeguarding Lead and relevant members of staff.

All academies are required to demonstrate how their systems manage effective filtering and monitoring by completing an annual digital standards audit.

Please refer to our separate Online Safety Policy and Use of Mobile Phones and Mobile Technology Policy for further details.

10.2 Acceptable Use of AI

The Trust recognises the potential of generative AI to enhance teaching, learning and administration when used appropriately, ethically and in alignment with our values and safeguarding responsibilities.

All content produced with AI must be professional, respectful and appropriate for a school environment. AI tools must not be used to create or share content that is illegal, offensive, discriminatory or hurtful. Harmful content includes, but is not limited to:

- Creating false, misleading or harmful content about another person;
- Impersonating, mimicking or mocking others without their consent;
- Generating or sharing content that is offensive, violent, threatening or otherwise inappropriate;
- Engaging any form of cyberbullying, harassment or harmful online behaviour;
- Using AI to create ‘deepfake’ images or videos of another person.

When using generative AI, staff, students and guests must take care to use appropriate prompts to create high-quality, safe content. Sensitive, personal or confidential information must not be used in prompts or uploads. This includes, but is not limited to:

- Students' names, date of birth or any other personally identifiable information;
- Staff personnel information or any internal documentation not approved for external sharing;
- Information related to student attainment, safeguarding cases, behavioural records or health-related data.

Any misuse of AI, when it affects others' safety, wellbeing or trust, will be treated seriously and referred to the Designated Safeguarding Lead. Where the misuse involves a member of staff, it will be reported directly to the Principal.

Please refer to our Acceptable Use of IT Policy for further details on acceptable use of AI within the Trust. There are separate policies for staff, students and guests.

11. Notifying Parents and Guardians

Where appropriate, we will discuss any concerns about a child with the child's parents or guardians. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents or guardians about any such concerns following consultation with the DSL.

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

In the case of allegations of abuse made against other children, we will normally notify the parents or guardians of all the children involved. If a decision is made not to inform parents, the CEO must be consulted.

12. Pupils with Special Educational Needs, Disabilities, or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs of such behaviours
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. Additional support may include:

- Regular pastoral check-ins and trusted adult support.
- Individual risk assessments and safeguarding plans where appropriate.
- Tailored communication strategies to ensure pupils can express their views, wishes and concerns.

- Support through nurture groups, emotional wellbeing interventions and Zones of Regulation approaches.
- Close collaboration between the safeguarding team, SENDCo, class teachers and external professionals.
- Additional monitoring of attendance, behaviour, wellbeing and peer relationships.
- Early Help or specialist referrals where additional support is required

All staff are encouraged to remain professionally curious and avoid making assumptions that a pupil's behaviour, presentation or communication difficulties are solely linked to their SEND or medical needs. Any safeguarding concerns will be recorded on CPOMS and referred to the Designated Safeguarding Lead in line with the school's safeguarding procedures.

13. Pupils with a social worker

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

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

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

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

14. Looked after, and previously looked after, children

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

- Appropriate staff have relevant information about each relevant child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of each relevant child's social workers and relevant virtual school heads
- We have appointed a designated teacher, Christina Thomas (ELSA), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with Virtual School Headteachers to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

15. Gender-Questioning Children

We recognise that pupils questioning their gender can make them vulnerable to discriminatory bullying. We will not tolerate bullying of any kind and will support pupils accordingly.

Our policies will maintain flexibility and avoid rigid rules based on gender stereotypes. We will adhere to the guidance outlined in KCSIE 2026, paragraphs 252 – 282, regarding social transition.

We will ensure that staff have the skills, knowledge and understanding to support pupils who are questioning their gender. The DSL will hold details of these pupils where it is known. Staff will report any concerns to the DSL, in line with our safeguarding reporting procedures.

16. Complaints and concerns about academy safeguarding policies

16.1 Complaints against staff

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

16.2 Other complaints

Please refer to our Complaints policies, which can be found on the Trust website.

16.3 Whistle-blowing

Please refer to our Whistle-blowing policy, which can be found on the Trust website.

17. Record Keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children are stored electronically via our CPOMS system. Once a child leaves the academy the records will be archived, and retained for a reasonable period of time after they have left the academy

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. This should happen as soon as possible and, in any event, within 5 working days for an in-year transfer or within the first 5 working days of the start of a new term. Confirmation of receipt should be obtained upon transfer. Where a file contains extensive historical information, a concise summary of current risk should be provided. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child. This process also applies to incoming school transfers. In these cases, the DSL should ensure they speak to the DSL of the previous school. Risk assessments should be put in place if required, and information shared with all relevant staff.

In addition:

- Appendix C sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix D sets out our policy on record-keeping with respect to allegations of abuse made against staff.

18. Training

18.1 All staff

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

This training will be provided by the academy, will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-academy safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 Safeguarding Partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils
    - Understand the measures in place to ensure pupils are safe online

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contracts, who are on site for significant periods when pupils are present, will also receive safeguarding training. Volunteers will receive appropriate training, as applicable.

The completion of training will be monitored by the Trust Safeguarding Lead and reported to the Trust Board via the Trustee responsible for Safeguarding.

18.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

18.3 Governors

All governors must receive and complete annual safeguarding training, as the Trust requires, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. Safeguarding Governors attend additional training and support throughout the year, both at Trust and academy level.

18.4 Recruitment – interview panels

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

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

18.5 EYFS staff who have contact with pupils and families

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

19. Site Security

19.1 External security

- All sites are surrounded by perimeter fencing and, wherever possible, access into the site is via remote control.
- The Trust has invested in external CCTV systems on all sites.
- All sites have security lighting systems.
- All security gates are checked for security at the end of each day.
- The Principal, academy business manager and premises manager review the security of each site regularly.

19.2 Entry into buildings

- All reception areas have security doors, which prevent unauthorised access to the building. In addition, these areas are designed to include a security 'lobby' area, which prevents unauthorised access via the front of the academy
- In the secondary phase, pupils and staff gain access by a controlled access card system. For increased security, this has now been extended to include individual classrooms
- Primary playground areas are secure and no external access to them is possible

19.3 Internal security

- CCTV cameras are in use at all times inside Trust buildings.
- All sites are fully alarmed. Each site has an active maintenance contract for the system. The alarm system is linked directly to essential services and to the premises team for each academy.
- All secondary pupils have an individual security locker.
- All computers and other IT equipment is password protected and have filters for increased internet security
- All pupil files are stored electronically. In addition, hard copies are also filed and stored in a secure area.

20. Monitoring and reporting arrangements

This policy will be reviewed **annually** by Ade Adetsoye, the Trustee responsible for safeguarding. At every review, it will be approved by the full Trust board.

Local Governing Bodies will be responsible for monitoring the implementation of the policy. They will note updates to the policy annually, following policy approval by Trustees. The identified safeguarding governor conducts at least two visits to their respective Academy each year, which focus explicitly on safeguarding, the Single Central Register and focus group outcomes. The safeguarding governor reports to their Academy's Local Governing Board Committee after each visit.

- The report from the annual internal safeguarding audit is reviewed at the relevant academy's LocalGoverning Body Committee, normally in their second meeting each academic year.
- The Academy's safeguarding governor's report on their year's visits and findings is reviewedannually at the relevant academy's Local Governing Body Committee normally in their third meeting each academic year.
- In those years where an external independent safeguarding audit has been commissioned by the Academy (at least every two years), the report from this will be reviewed at the relevant academy'sLocal Governing Body Committee normally in their fourth meeting of the academic year.

Each academy within the Trust has an independent safeguarding audit at least every two years. The audits are commissioned by the Trust and the resulting reports are reviewed at the relevant Academy's Local Governing Body Committee meeting immediately following the audit. In the intervening years a peer audit will be carried out by a DSL from another academy in the Trust.

Internally, Child Protection will be reported on through the termly formal Keeping in Touch (KIT)meetings between each Principal and the CEO of the Trust.

In addition to the above, major child protection issues will be reported as and when they arise at LGB Committee meetings by the Principal or Vice Principal.

21. Links to other policies

This policy links to the following policies and procedures:

- Behaviour
- Anti-Bullying
- Attendance
- Online Safety
- Acceptable Use of IT
- Mobile Phone and Mobile Technologies
- Recruitment and Selection
- Staff code of conduct
- Complaints
- SEND
- Health and safety
- Equality
- Relationships and sex education
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Data Protection
- Whistleblowing
- Early Years Foundation Stage
- Photography and Video

Appendix A: Types of abuse

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others, for example the impact of all forms of domestic abuse, including where they see, hear or experience its effects

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person; verbal abuse such as persistent criticism, belittling or name calling
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the Trust's policy and procedures for dealing with it.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

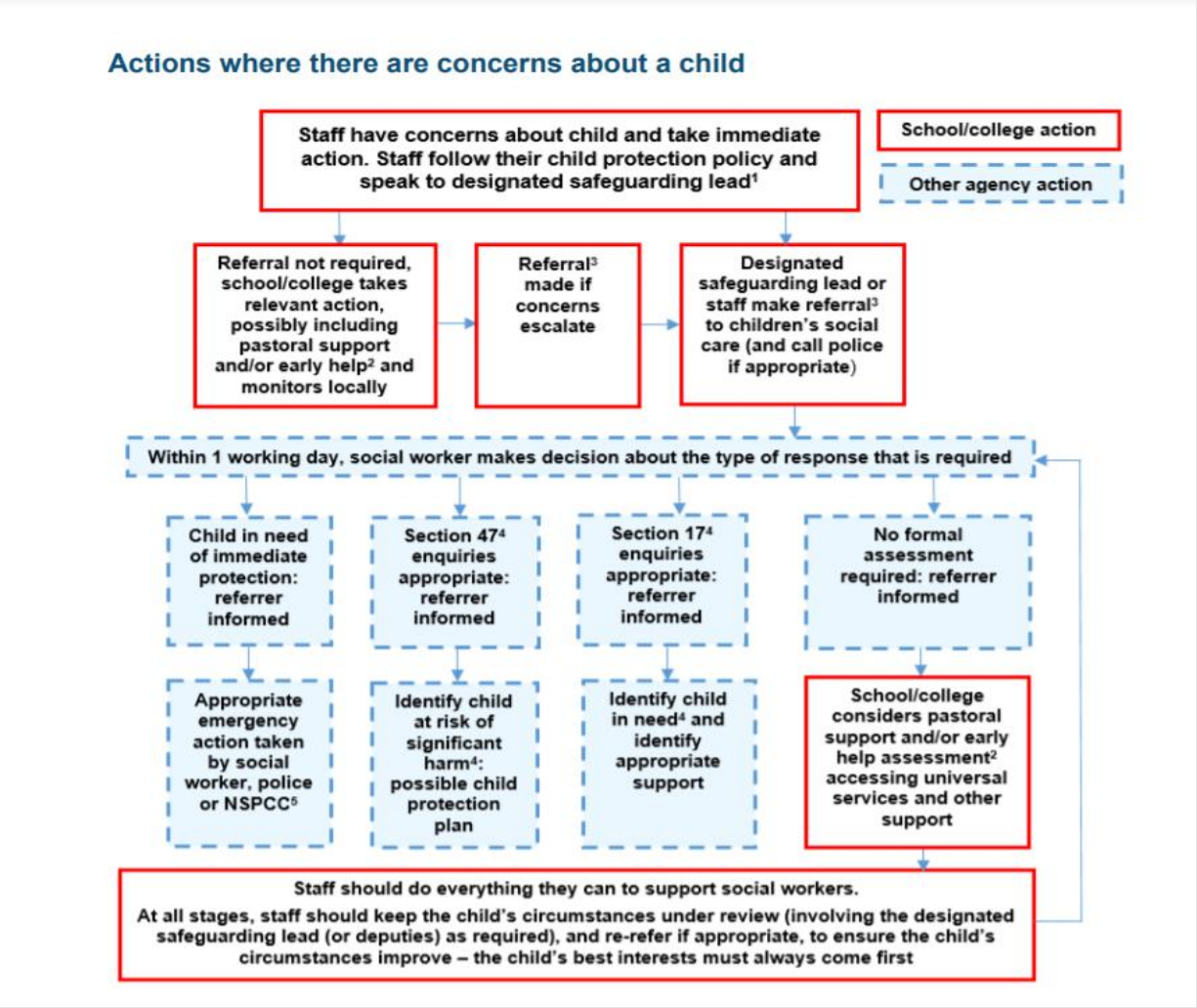
Once a child is born, neglect may involve a parent or carer failing to:

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

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

Prejudice-based harm includes racism, faith-based harm and other types of discrimination. It may affect a child's welfare, wellbeing, mental health and willingness to seek help.

Appendix B: Action when a child has suffered or is likely to suffer harm



This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to pupil's social care immediately. Anybody can make a referral.

1. In cases, which also involve an allegation of abuse against a staff member, see Part Four of 'KCSIE' guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child'slife. Where a child would benefit from co-ordinated early help, an early help inter-agencyassessment should be arranged. Chapter One of 'Working Together to Safeguard Pupils' provides detailed guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter One of 'Working Together to Safeguard Pupils'.
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children. This could include applying for an Emergency Protection Order (EPO).

Appendix C: Safer Recruitment

All Trust academies practice a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse pupils.

This ensures that the academy acts reasonably in making decisions about the suitability of the prospective employee based on checks and evidence including criminal record checks (DBS checks), barred list checks and prohibitionchecks, together with references and interview information. The academy ensures that at least one member of staff on any recruitment panel has received Safer Recruitment training.

Any volunteer (as well as any member of staff) who teaches, trains, instructs or supervises children frequently, on more than 3 days in a 30-day period, or overnight, is in regulated activity - regardless of whether they are supervised - and must have an enhanced DBS check with children's barred list information. Volunteers must not be permitted to start working in settings covered by the EYFS framework until an enhanced DBS check and Barred List check has been completed satisfactorily.

1. A Single Central Record (SCR) will be maintained for each academy, containing the recruitment andvetting checks for staff and others identified as having regular contact with pupils, including volunteers and trainee teachers. There will be a separate SCR for Trust staff. School SCRs are monitored regularly by the Principal. Additional Trust checks are carried out on a termly basis, by the Senior Director: School Improvement and the Senior Director: People.
2. All newly appointed staff will undergo an enhanced Disclosure and Barring Service (DBS) check prior to them taking up employment. Volunteers (including governors) who have regular contact with pupils will also undergo a DBS check.
3. In the case of supply staff, the academy will receive written notification from a proposed supply staffmember's employment business that an enhanced DBS check has been made or an enhanced DBS certificate has been obtained. They will also be given details regarding safeguarding which is highlighted on arrival for the specific academy and the process of referral for any concerns.
4. For all senior staff, or those engaged in management roles, an additional check is required to ensurethey are not prohibited under section 128 provisions.
5. **The Trust Recruitment Policy contains further details**, including:
    - *ensuring the job description refers to the responsibility for safeguarding and promoting thewelfare of pupils;*
    - *ensuring that the person specification includes specific reference to suitability to work with pupils;*
    - *obtaining and scrutinising comprehensive information from applicants, and taking up andsatisfactorily resolving any discrepancies or anomalies;*
    - *obtaining independent, professional and character references before an employment letter/contract is signed, that answer specific questions to help assess an applicant's suitabilityto work with pupils and following up any concerns;*
    - *a face-to-face interview that explores the candidate's suitability to work with pupils as well ashis or her suitability for the post;*
    - *verifying the successful applicant's identity;*
    - *verifying that the successful applicant has the academic or vocational qualifications claimed;*
    - *checking his or her previous employment history and experience; and*
    - *verifying that s/he is at a required level of health and physical capacity for the job,*

whilst complying with the Trust's obligations under equality law including the requirement tomake reasonable adjustments for people with disabilities.

All academies must ensure they have an annual written confirmation from any alternative provision which pupils may attend that all vetting and barring procedures for staff have been correctly followed by the provision.

Appendix D: Allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors [in independent schools: proprietor] where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

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

Based on an assessment of risk, we will consider alternatives such as:

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

If in doubt, the case manager will seek views from the academy's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

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

False: there is sufficient evidence to disprove the allegation

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

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the academy and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in the academy and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Those facing allegations may also seek support from a trade union

representative or work colleague. Support for their wellbeing is also available through a counselling support service, or through seeking medical advice via our occupational health service.

- Inform the parents or guardians of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or guardians of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or guardians of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the academy is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the academy will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the academy's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Principal will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the academy, while the academy carries out the investigation
- We will involve the agency fully, but the academy will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the academy will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the academy will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the academy.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

In these cases, the academy will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the academy's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the academy that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the academy
- Pre-employment vetting checks

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

Definition of low-level concerns

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

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- 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

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 9.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the academy's safeguarding system

Responding to low-level concerns

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

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

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's code of conduct.

Record keeping

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

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the academy
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix E: Alternative Provision

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

All schools must:

- Obtain written confirmation that safeguarding employment checks have been completed by the provider;
- Keep an accurate record of where the child is, including all sites attended;
- Review placements at least every half term to ensure safety and suitability and keep a record;
- Immediately review or end placements if safeguarding concerns arise;
- Hold the provider to account to ensure they notify the school of any staff changes or risks;
- Report regularly to governors with updates on any alternative provision placements.

The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

- Alternative Provision DFE statutory guidance
- Education for children with health needs who cannot attend school

Appendix F: Further information

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a warning sign for a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. Early intervention is essential to help prevent the risks of a child going missing in the future.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the academy without a new school being named and adhering to requirements with respect

to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. CCE can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. This may constitute modern slavery, and where a potential victim of CCE is identified, a child protection referral and a modern slavery referral (via the National Referral Mechanism) should both be completed.

Indicators of CCE can include a child:

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

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

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. CSE can be committed by an individual or an organised network, and most sexual abuse is committed by individuals already known to the victim. As with CCE, victims may be criminalised for actions taken under coercion and should be recognised and treated as victims.

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

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the academy usually the designated safeguarding lead) before the child or children arrive at the academy the following day. Operation Encompass

The DSL is the academy's 'Key Adult' for Operation Encompass notifications and is responsible for making any resulting safeguarding referrals.

Staff can access advice from the Operation Encompass helpline (0204 513 9990, Monday to Friday, 8:00-13:00) and from the National Domestic Abuse Helpline (0808 2000 247, 24 hours).

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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. The legal marriage age is 18. Children can **no longer** marry below this age with parental consent.

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

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

The DSL will:

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

Preventing radicalisation

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

Extremism is vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

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

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our academy being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 9.5 of this policy, including discussing their concerns with the DSL.

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

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

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, and that it is preventable: timely, evidence-based support can help prevent children from going on to commit abuse or violence.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- 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)
- Serious physical assault and harm, or the threat of harm with a weapon
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse and may include misogyny/misandry
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should recognise the escalatory nature of misogyny and should challenge behaviours that are potentially criminal in nature, such as: grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 9.8 and 9.9 set out more detail about our academy's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment, including misogyny or misandry, is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, section 9.8 and 9.9 set out more detail about our academy's approach to this type of abuse.

Serious violence

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

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

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

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL. Staff should also be aware that serious violence can peak in the periods just before and after the school day, when pupils are travelling to and from academy premises.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

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

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

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

Non-collection of children

At Knights Primary School, if a child is not collected at the end of the school day, staff will follow the school's late collection procedures. Reasonable attempts will be made to contact parents/carers and all emergency contacts. The child will remain supervised by appropriate staff at all times.

Where a child has not been collected and contact cannot be made with a parent/carer or authorised adult, the Designated Safeguarding Lead (DSL) or senior leader on duty will be informed. If concerns remain about the child's safety or welfare, Children's Social Care and/or the police may be contacted for advice and support. All actions taken will be recorded.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a pupil is discovered to be missing during the school day, staff will immediately inform the school office and senior leaders. A systematic search of the school site and grounds will be undertaken, and the pupil's whereabouts will be checked with staff and peers.

If the pupil is not located promptly, parents/carers will be informed and, where appropriate, the police will be contacted. The DSL will consider any safeguarding risks and ensure that all actions and outcomes are recorded on CPOMS.

The school recognises that children who go missing or are absent from education may be at increased risk of harm. We will follow local authority procedures for children missing education and work closely with external agencies where safeguarding concerns are identified.

Appendix G: Local Context and Contacts

Knights Primary School

FFCP referrals

Phone: 02083146660

Online:

https://lewisham.gov.uk/myservices/socialcare/children/keeping-children-safe/multi-agency-safeguarding-hub

Local Authority Designated Officer

Name: Morgan Bradshaw

Phone: 07825014841

Email: morgan.bradshaw@lewisham.gov.uk

Safeguarding Children Board

Phone: 02083143396

Website: www.safeguardinglewisham.org.uk

Email: safeguardingpartnership@lewisham.gov.uk

Appendix H: Safeguarding contacts poster

Schools should add information here