

INSPIRE

INCLUDE

INTEGRITY

EXCEED



Exceed Learning Partnership

• EVERY CHILD • EVERY CHANCE • EVERY DAY •

# Safeguarding and Child Protection Policy (Academy)

Status	Statutory
Version	11
Responsible Directors' Board	Delegated to Local Governing Board
Responsible Persons	Head of Safeguarding and Inclusion
Date Policy Reviewed	August 2025
Next Review Date	September 2026

Academy personalisation required (in highlighted fields)



Exceed Learning Partnership

• EVERY CHILD • EVERY CHANCE • EVERY DAY •

## Summary of Changes from Previous Version

Version	Date	Author	Summary of Updates
V2	26/09/2022	Dawn Slater	<ul style="list-style-type: none"> <li>3. Statutory Framework Reference to Sexual violence and sexual harassment between children in schools and colleges (DfE 2021) removed and replaced with KCSIE 2022.</li> <li>Page 22 addition of child-on-child sexual violence and sexual harassment flowchart.</li> </ul>
V3	14/03/2023	Dawn Slater	<ul style="list-style-type: none"> <li>Page 52 change of LADO contact email</li> <li>Page 43 administering of intimate care plans</li> </ul>
V4	May 2023	A Hibbitt	<ul style="list-style-type: none"> <li>Updated Hall Cross contact details within appendix</li> </ul>
V5	July 2023	Dawn Slater	<ul style="list-style-type: none"> <li>1. Updated Rationale.</li> <li>2. Governors' Statement includes reference to outside agencies delivering activities following academy safeguarding procedures.</li> <li>4. Principal's role updated including supervision of DSL.</li> <li>4. DSL's role updated including responsibility for filtering and monitoring.</li> <li>5. Includes reference to child victims of trafficking/modern day slavery.</li> <li>5. Referring to children absent from education and children missing from education.</li> <li>5. Referring to children/young people who may be susceptible to radicalisation as opposed to vulnerable.</li> <li>6. Includes reporting concerns re mental health.</li> <li>9. Online Safety includes commitment to following the DfE standards for filtering and monitoring.</li> <li>9. Definition of reasonable force included.</li> <li>10. Inclusion of allegations against staff for behaviour outside of the workplace.</li> <li>Appendix 1. Updated contacts list</li> </ul>
V6	Feb 2024	Strategic Safeguarding Lead	<ul style="list-style-type: none"> <li>Updated to reflect updated guidance Working Together to Safeguard Children (December 2023) to replace previous reference to Working Together to Safeguarding Children (2018)</li> </ul>
V7	April 2024	Strategic Safeguarding Lead	<ul style="list-style-type: none"> <li>Key Safeguarding contacts updated within appendix 1</li> </ul>
V8	July 2024	Strategic Safeguarding Lead	<ul style="list-style-type: none"> <li>Change of policy owner to Matt Copestick</li> <li>Throughout policy – Update KCISE 2023 to KCISE 2024</li> <li>Re-write of policy. Now based on City of Doncaster Council 'model safeguarding policy'</li> </ul>

V9	September 2024	Strategic Safeguarding Lead	<ul style="list-style-type: none"> <li>Page 20 – Replace the requirement of informing the CEO with informing the Strategic Safeguarding Lead where there are concerns about the conduct of Principal.</li> <li>Appendices added – safeguarding process flows</li> <li>Clarity of language – ‘school’ replaced with ‘academy’ where appropriate ‘child’ replaced with ‘pupil’ where appropriate</li> </ul>
V10	October 2024	Strategic Safeguarding Lead	<ul style="list-style-type: none"> <li>Section 11 – CIC updated to LAC.</li> <li>Addition of Appendix F - DSL Job Description.</li> <li>Section 8 – Reference made to Appendix B: Process flow for reporting safeguarding concerns and reference made to non-statutory guidance ‘What to do if you’re worried a child is being abused (2014).’</li> <li>Section 5 – Reference made to the DFE statutory guidance ‘Working together to improve school attendance (2024).’</li> </ul>
V11	August 2025	Head of Safeguarding and Inclusion	<ul style="list-style-type: none"> <li>Policy re-write using Browne Jacobson template.</li> <li>Policy updated to reflect Keeping Children Safe in Education (2025).</li> </ul>

## Contents

Summary of Changes from Previous Version	2
<b>Contents</b>	<b>3</b>
<b>1. Our Safeguarding Culture</b>	<b>5</b>
<b>2. Safeguarding legislation and guidance</b>	<b>5</b>
<b>3. Roles and responsibilities</b>	<b>6</b>
<b>4. Children who may be particularly vulnerable</b>	<b>9</b>
Children with special educational needs and disabilities.....	9
Children who are absent from education.....	10
Alternative provision.....	10
Children who are lesbian, gay, bi or trans (LGBT).....	10
<b>5. Child protection procedures</b>	<b>11</b>
a) Recognising abuse.....	11
b) Taking action.....	11
c) If you are concerned about a pupil / student’s welfare.....	11
d) If a pupil / student discloses to you.....	11
e) Notifying parents.....	12
f) Referral to the Multi-Agency Safeguarding Hub (MASH).....	12
g) Reporting directly to child protection agencies.....	13
h) Confidentiality and sharing information.....	13



i)	Sharing information.....	13
j)	Storing information.....	13
<b>6.</b>	<b>Safeguarding issues – including local issues and guidance</b>	<b>13</b>
a)	Child-on-child abuse.....	13
b)	Serious Violence.....	15
c)	Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE).....	15
d)	County Lines.....	17
e)	Sharing Nudes and Semi Nudes.....	18
f)	Online safety.....	19
g)	Mobile phones.....	19
h)	Domestic abuse.....	20
i)	Honour-based abuse.....	20
j)	Female genital mutilation.....	20
k)	Forced marriage.....	21
l)	Radicalisation and extremism.....	21
m)	Staff/pupil relationships.....	21
<b>7.</b>	<b>Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers</b>	<b>22</b>
	Whistleblowing if you have concerns about a colleague.....	22
<b>8.</b>	<b>Staff and governor training</b>	<b>22</b>
<b>9.</b>	<b>Safer recruitment</b>	<b>23</b>
<b>10.</b>	<b>Site security</b>	<b>23</b>
<b>11.</b>	<b>Special circumstances</b>	<b>23</b>
a)	Looked after children (LAC).....	23
b)	Children who have a social worker.....	23
c)	Work experience.....	24
d)	Children staying with host families.....	24
e)	Private fostering arrangements.....	24
<b>Appendix 1:</b>	<b>Four categories of abuse</b>	<b>25</b>
a)	Physical abuse.....	25
b)	Emotional abuse.....	25
c)	Sexual abuse.....	26
d)	Neglect.....	27
<b>Appendix 2:</b>	<b>Related safeguarding polices</b>	<b>28</b>
<b>Appendix 3:</b>	<b>Process flow for reporting safeguarding concerns</b>	<b>29</b>
<b>Appendix 4:</b>	<b>Process flow for responding to concerns of FGM</b>	<b>30</b>
<b>Appendix 5:</b>	<b>Process flow for responding to reports of sexual violence and sexual harassment</b>	<b>31</b>
<b>Appendix 6:</b>	<b>Additional information for responding to reports of sexual violence and sexual harassment</b>	<b>32</b>



## **1. Our Safeguarding Culture**

### **Why it is important**

Safeguarding is everyone's responsibility, and it is the duty of the academy to safeguard and promote the welfare of children. 'Children' includes everyone under the age of 18. This is our core safeguarding principle.

In adhering to this principle, we focus on providing a safe and welcoming environment for all of our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All of our children have equal rights to support and protection.

One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, and governors, all of whom are trained upon its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law and guidance and best practice.

This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

### **What it means for our pupils / students**

We work with our local safeguarding partners to promote the welfare of children and to protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans, which provide additional support to the child. It also includes contributing to broader, multi-agency strategic discussions about safeguarding children.

All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issues will receive appropriate support.

Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils, and we set a good example by conducting ourselves appropriately.

Identifying safeguarding and child protection concerns often begins with recognising changes in pupils' attendance and/or behaviour and knowing that these changes may be signs of abuse, neglect, or exploitation. Challenging behaviour may also be an indicator of abuse.

All of our staff will reassure children that their concerns and disclosures will be taken seriously, and that they will be supported and kept safe.

## **2. Safeguarding legislation and guidance**

The following safeguarding legislation and guidance has been considered when writing this policy:

- Keeping Children Safe in Education (2025)
- Working Together to Safeguard Children (2023)

- What to do if you're worried a child is being abused (2015)
- Information Sharing – Advice for practitioners providing safeguarding services for children, young people, parents and carers (2024)
- Prevent duty guidance: Guidance for specified authorities in England and Wales (2023)
- The Teacher Standards 2012
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2021
- PACE Code C 2019
- Working Together to Improve School Attendance (2024)
- Public Sector Equality Duty (PSED)
- Statutory Framework for the Early Years Foundation Stage (EYFS)

### 3. Roles and responsibilities

**The Designated Safeguarding Lead (DSL) is:**

**Simon Martin**

**The Deputy DSL(s) is/are:**

**Davina Sumner**

**Michael Parkinson**

**Rebecca Southorn**

**Nichola Rossall**

**Kate Ellway**

**The safeguarding governor/Trustee is:**

**Liz Barkham**

**The Executive Principal is:**

**Davina Sumner**

**The Head of School is:**

**Simon Martin**

**The Prevent Lead is:**

**Simon Martin**

**The Online Safety Lead is:**

**Simon Martin**

**The Designated Teacher for Looked After Children is:**

**Simon Martin**

**The Inclusion / Pastoral Lead is:**

**Rebecca Southorn**

**The Senior Leader for Mental Health is: (where the academy has a member of staff who holds the SLMH qualification)**

**Davina Sumner**

**The designated safeguarding lead (DSL):**

The designated safeguarding lead takes **lead responsibility** for safeguarding and child protection (including online safety) in the academy. The DSL duties include:

- Ensuring child protection policies are known, understood, and used appropriately by staff.
- Working with the board of trustees and local governing body to ensure that the child protection policies are reviewed annually and that the procedures are reviewed regularly.
- Acting as a source of support, advice, and expertise for all staff on child protection and safeguarding matters.
- Liaising with the Principal regarding ongoing enquiries under Section 47 of the Children Act 1989 and police investigations, and be aware of the requirement for children to have an appropriate adult in relevant circumstances.
- Acting as a point of contact with the three safeguarding partners.
- Making and managing referrals to children's social care, the police, or other agencies.

- Keeping detailed, accurate, secure written records of concerns, discussions, and decisions made, including the rationale for those decisions (including where referrals were or were not made).
- Taking part in strategy discussions and inter-agency meetings.
- Making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements.
- Transferring the child protection file to a child's new school.
  - Work with the Principal to ensure that the relevant staffing ratios are met, where applicable].
  - Work with the Principal to ensure that each EYFS child is assigned a key person].

**The deputy designated safeguarding lead(s):**

- Our deputy DSL(s) are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

**Other safeguarding contacts:**

Local Authority Designated Officer (LADO)	Milovan Orlandich <a href="mailto:LADO@doncaster.gov.uk">LADO@doncaster.gov.uk</a> 01302 737332  <u><a href="#">Allegations against adults working with children referral form (LADO) - City of Doncaster Council</a></u>
Safeguarding Adviser – Local Authority	Jo Howe <a href="mailto:Jo.howe@doncaster.gov.uk">Jo.howe@doncaster.gov.uk</a> 01302 736975/07816353019
Children's Social Care <u><a href="#">Safeguarding concern - child at risk report form - City of Doncaster Council</a></u>	01302 737777 <a href="mailto:ChildrenAssessmentService@doncaster.gov.uk">ChildrenAssessmentService@doncaster.gov.uk</a>
Out of hours Children's Social Care	01302 796000
Professionals line – Social Care	01302 737033
MASH Early Help  Early Help Coordinators <u><a href="#">Early Help - What is it in Doncaster? - City of Doncaster Council</a></u>	01302 734110 <a href="mailto:EarlyHelpHub@doncaster.gov.uk">EarlyHelpHub@doncaster.gov.uk</a>  01302 736250 <a href="mailto:EarlyHCo@doncaster.gov.uk">EarlyHCo@doncaster.gov.uk</a>



Parent and Family Support Services (PAFSS)	Central - <a href="mailto:Sammy.Taylor-Brown@doncaster.gov.uk">Sammy.Taylor-Brown@doncaster.gov.uk</a> 01302 862680 North - <a href="mailto:Rebecca.Evertons@doncaster.gov.uk">Rebecca.Evertons@doncaster.gov.uk</a> 01302 737994 East - <a href="mailto:Nicola.paterson@doncaster.gov.uk">Nicola.paterson@doncaster.gov.uk</a> 01302 737686 South - <a href="mailto:Charlotte.Brookes@doncaster.gov.uk">Charlotte.Brookes@doncaster.gov.uk</a> 01302 735906
Your Place, Your Family <a href="http://YourPlaceYourFamilyTeams   Doncaster Safeguarding Children Partnership (dscp.org.uk)">Your Place Your Family Teams   Doncaster Safeguarding Children Partnership (dscp.org.uk)</a>	Central – 01302 736409 North – 01302 736787 East – 01302 736336 South – 01302 736644 <a href="mailto:YourPlaceYourFamilyTeam@doncaster.gov.uk">YourPlaceYourFamilyTeam@doncaster.gov.uk</a>
Virtual School <a href="http://Virtual School Children in Care team - City of Doncaster Council">Virtual School Children in Care team - City of Doncaster Council</a>	01302 737880
Child Missing in Education (CME) <a href="http://Children Missing Education - City of Doncaster Council">Children Missing Education - City of Doncaster Council</a>	<a href="mailto:childrenmissingeducation@doncaster.gov.uk">childrenmissingeducation@doncaster.gov.uk</a>
Prevent	Emergency – 999 Non-emergency 101 <a href="mailto:PreventSouth@ctpne.police.uk">PreventSouth@ctpne.police.uk</a> Council contact: Rachael Long – Crime & Community Safety Theme Manager 01302 737469 Channel Helpline - 020 7340 7264
Local Police – PCSO link	
School Nursing Service	Single Point of Contact – 03000 218997 Website - Zone5-19.rdash.nhs.uk <a href="mailto:Rdash.doncasterchildrenscaregroup@nhs.net">Rdash.doncasterchildrenscaregroup@nhs.net</a>
Exceed Learning Partnership – Trust central office CEO, Deputy CEO and Director of Primary are contactable through this number	01709 805175
Exceed Learning Partnership Head of Safeguarding and Inclusion	Matt Copestick <a href="mailto:m.copestick@elp.org.uk">m.copestick@elp.org.uk</a> 07354 848159

#### 4. Children who may be particularly vulnerable

Some children are at greater risk of abuse, neglect, and exploitation. This increased risk can be caused by many factors including social exclusion, isolation, discrimination, and prejudice. To ensure that all of our pupils receive equal protection, we give special consideration to children who:

- Are vulnerable because of their race, ethnicity, religion, special educational needs, disability, gender identity or sexuality.
- Are vulnerable to being bullied, or engaging in bullying.
- Are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism.
- Live in chaotic or unsupportive home situations.
- Live transient lifestyles or live away from home or in temporary accommodation.
- Are affected by parental substance abuse, domestic abuse or parental mental health needs.
- Do not have English as a first language.
- Experience or have experienced bereavement or mental health difficulties.
- Are in care or privately fostered or have returned home to their family from care.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded.

### **Children with special educational needs and disabilities**

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges.

Additional barriers can exist when recognising abuse, neglect, and exploitation in this group of children, which can include:

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

Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

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

Children being absent from education for prolonged periods, on an increasing basis and/or on repeat occasions, and children with unexplainable and/or persistent absences from education, can be an indicator of abuse, neglect, and exploitation, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

We closely monitor attendance, absence, and exclusions and our DSL will take appropriate and proactive action, including notifying the local authority, particularly where children go missing on repeated occasions, on an increasing basis, and/or are missing for periods during the academy day.

### **Alternative provision**

Where a pupil is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will ensure we are satisfied that the placement meets the pupil's needs.

### **Mental Health**

The academy has an important role to play in supporting the mental health and wellbeing of our pupils / students.

All staff are aware that mental health problems can be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences, those experiences can impact on their mental health, behaviour, and education.

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy who will alert other relevant agencies as necessary.

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

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm.

Unfortunately, children who are LGBT, or are simply perceived to be LGBT, can be targeted by other children. The risk to these children can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.

When supporting a gender questioning child, as recommended by statutory guidance (KCSIE 2025), we take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

## **5. Child protection procedures**

A process flow for raising concerns can be found in appendix 3 of this policy.

### **a) Recognising abuse**

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education 2025 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

**b) Taking action**

- Any child could become a victim of abuse. Key points for staff to remember for taking action are:
- In an emergency take the action necessary to help the child, if necessary, call 999.
- Record the concern with the DSL as soon as possible.
- Share information on a need-to-know basis only and do not discuss the issue with colleagues, friends, or family.

**c) If you are concerned about a pupil / student's welfare**

Staff may suspect that a pupil / student could be at risk. This may be because the pupil / student's behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the pupil / student the opportunity to talk and ask if they are okay.

If the pupil / student does reveal that they are being harmed, staff should follow the advice below.

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

**d) If a pupil / student discloses to you**

If a pupil / student tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- Remain calm and not overreact.
- Allow them to speak freely.
- Not be afraid of silences.
- Not ask investigative questions.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Not automatically offer physical touch as comfort.
- Let the pupil / student know that in order to help them they must pass the information on to the DSL.
- Tell the pupil / student what will happen next and give them an opportunity to ask questions about what will happen next.
- Inform the DSL as soon as possible.

- Record the disclosure using CPOMS (our child protection electronic record).
- Let the pupil / student know when they can expect to be updated or receive more information, emphasising that the pupil can talk to them or the DSL at any time.

**e) Notifying parents**

The school will normally seek to discuss any concerns about a pupil / student with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

**f) Referral to the Multi-Agency Safeguarding Hub (MASH)**

The DSL will make a referral to children's social care if it is believed that a pupil / student is suffering or is at risk of suffering significant harm. The pupil / student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

MASH is a multi-disciplinary team within the City of Doncaster Council with two main functions:

- Providing information, advice and guidance to professionals who have queries about children who may need a coordinated early help response or a social care response.
- Screening all social care enquiries to ensure an appropriate level of response for the child/young person and family.

The team is available from 8.30am to 5.00pm, Monday to Friday, and telephone messages will be responded to within one working day. Telephone: 01302 737777.

**g) Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the DSL, the deputies, the Principal or a senior leader are not available, and a referral is required immediately.

**h) Confidentiality and sharing information**

Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the DSL, deputy DSL, Principal, Trust Head of Safeguarding and Inclusion or members of the Central Executive Team.

**i) Sharing information**

The DSL will normally obtain consent parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent and will record the reason for deciding to do so.

Information sharing will take place in a timely and secure manner, and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

The UK GDPR and the Data Protection Act 2018 do not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil / student or parent to see child protection records, they will refer the request to the Data Protection Officer.

**j) Storing information**

Child protection information will be stored separately from the pupil / student's school file electronically in CPOMS and handled according to the Data Retention and GDPR policies. These policies can be accessed via the academy website.

## 6. Safeguarding issues – including local issues and guidance

**a) Child-on-child abuse**

Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is more likely that boys will be perpetrators of child-on-child abuse and girls' victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

All staff should be clear about the academy policy and procedures for addressing child-on-child abuse and maintain an attitude of 'it could happen here'.

Child-on-child abuse can take many forms, including:

- **Physical abuse** such as shaking, hitting, biting, kicking or hair pulling.
- **Bullying**, including cyberbullying, prejudice-based and discriminatory bullying.
- **Sexual violence and harassment** such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes.
- **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.
- **Up skirting**, which involves taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm.
- **Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)** including pressuring others to share sexual content.
- **Abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse.

- **Initiation/hazing** – used to induct newcomers into a sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing-type violence.

All staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries.
- Using assemblies to outline acceptable and unacceptable behaviour.
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs, and other suitable activities.
- Ensuring that the academy is well supervised, especially in areas where children might be vulnerable.

All allegations of child-on-child abuse should be passed to the DSL immediately, who will investigate and manage the allegation as follows:

- **Gather information** - children and staff will be spoken with immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil / student and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Recorded** – all concerns, discussions, and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential, and stored securely on the school's child protection and safeguarding systems, and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached, and the outcome.

Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2025.

Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy.

Supporting those involved, our staff reassure all victims 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. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

Abuse that occurs online or outside of academy will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

The support required for the pupil / student who has been harmed will depend on their particular circumstances and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work.

Support may also be required for the pupil / student that caused harm. We will seek to understand why the pupil / student acted in this way and consider what support may be required to help the pupil / student and/or change behaviours. The consequences for the harm caused or intended will be addressed.

**b) Serious Violence**

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of mental health difficulties, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment, and having been involved in offending, such as theft or robbery.

**c) Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator, and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:

Age.

Gender.

Sexual identity.

Cognitive ability.

Physical strength.

Status.

Access to economic or other resources.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

### **Child Criminal Exploitation (CCE)**

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys, and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

#### **CCE indicators can include children who:**

- (a) Appear with unexplained gifts or new possessions.
- (b) Associate with other young people involved in exploitation.
- (c) Suffer from changes in emotional well-being.
- (d) Misuse drugs or alcohol.
- (e) Go missing for periods of time or regularly return home late.
- (f) Regularly or increasingly miss school or education or do not take part in education.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse, which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

### **CSE indicators**

The above indicators can also be indicators of **CSE**, as can children who:

- Have older boyfriends.
- Suffer sexually transmitted infections or become pregnant.

We include the risks of criminal and sexual exploitation in our RSE and PSHE curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.

Victims of criminal and sexual exploitation can be boys or girls, and it can have an adverse impact on a child's physical and emotional health.

All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

### **d) County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store, and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure the compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child.

Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. The main indicator being missing episodes from home and/or school.

Additional specific indicators that may be present where a child is criminally exploited include children who:

- Go missing and are subsequently found in areas away from home.
- Have been the victim or perpetrator of serious violence (e.g. knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

- Are found in accommodation with which they have no connection or in a hotel room where there is drug activity.
- Owe a 'debt bond' to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

All staff are aware of indicators that children are at risk from or are experiencing criminal exploitation. The main indicator is increased absence, during which time the child may have been trafficked for the purpose of transporting drugs or money.

**e) Sharing Nudes and Semi Nudes**

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them, claiming to be from a peer.
- Children and young people digitally manipulate an image of a young person into an existing nude online, including the use of Generative Artificial Intelligence (AI).
- Images created or shared are used to abuse peers, e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

All incidents involving nude or semi-nude images will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.

- At any point in the process, if there is a concern that a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in February 2024- [UKCIS advice 2024](#). The academy will have regard to this advice when managing these issues.

**f) Online safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate and effective filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. Our filtering and monitoring systems also prevent access to harmful and inappropriate content accessed through generative AI tools and products.

These filtering and monitoring systems block harmful and inappropriate content, and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least annually) to ensure their effectiveness, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils.

Online safety risks can be categorised into four areas of risk:

- Content:** being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- Contact:** being subjected to harmful online interaction with other users such as peer to peer pressure, and adults posing as children or young adults to groom or exploit children.
- Conduct:** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending, and receiving explicit images, sharing other explicit images and online bullying.
- Commerce:** risks such as online gambling, inappropriate advertising, phishing, or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL.

**g) Mobile phones**

The academy has a separate Mobile Phones in Schools policy. This outlines the expectations for staff, pupils / students, and visitors.

**h) Domestic abuse**

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear, or experience the effects of abuse.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse, between those aged 16 or over who are, or have been, intimate partners, or family

members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the academy has up-to-date safeguarding information about the child.

All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

**i) Honour-based abuse**

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

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors, and we take them into consideration when deciding what safeguarding action to take.

If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

**j) Female genital mutilation**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.

FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.



**k) Forced marriage**

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. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse.

Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

Forced marriage is not the same as arranged marriage, which is common in many cultures.

If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

**l) Radicalisation and extremism**

Extremism is defined as vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process of a person legitimising support for, or use of terrorist violence.

Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions, and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

**m) Staff/pupil relationships**

Staff are aware that inappropriate behaviour towards pupils / students is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil / student.

We provide our staff with advice regarding their personal online activity, and we have clear rules regarding electronic communications and online contact with pupil / students. It is considered a serious disciplinary issue if staff breach these rules.

Our Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

## **7. Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers**

If a safeguarding concern or allegation is made about a member of staff, supply staff, contractor or a volunteer, or relates to incidents that happened when an individual or organisation was using the academy premises for the purposes of running activities for children, our set procedures must be followed. Our safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers procedure can be found in the Managing Allegations Against Staff Policy, and the full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2025.

Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.

#### **Whistleblowing if you have concerns about a colleague**

It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the Principal, unless the complaint is about the Principal, in which case:

- Contact the Head of Safeguarding and Inclusion for Primary Principals
- Contact the Deputy CEO for the Secondary Principal

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

The academy whistleblowing policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

## **8. Staff and governor training**

Our staff receive appropriate safeguarding and child protection training (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils.

New staff and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our Staff Code of Conduct, how to report and record concerns and information about our DSL and deputy DSLs.

Our governors receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenges to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

## **9. Safer recruitment**

The governing body and our senior leadership team are responsible for ensuring we follow recruitment procedures that help to deter, reject, or identify people who might harm children. When doing so, we check and verify the applicant's identity, qualifications, and work history in accordance with Keeping Children Safe in Education 2025 and the local safeguarding partner arrangements.

All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and request DBS checks where required by Keeping Children Safe in Education 2025. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The academy maintains the single central record (SCR) of recruitment checks. Our recruitment procedures can be found in the Safer Recruitment Policy.

## 10. Site security

Visitors are asked to sign in at the academy reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the academy site. Visitors who have not undergone the required checks will be escorted at all times.

## 11. Special circumstances

### a) Looked after children (LAC)

The most common reason for children becoming looked after is as a result of abuse or neglect. The academy ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

### b) Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

### c) Work experience

The academy has detailed procedures to safeguard pupils / students undertaking work experience, including arrangements for checking people who provide placements and supervise pupils / students on work experience which are in accordance with statutory guidance.

**d) Children staying with host families**

The academy may make arrangements for pupils / students to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the statutory guidance, KCSIE 2025, to ensure hosting arrangements are as safe as possible.

Academies cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where pupils / students stay with host families abroad, we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our DSL will ensure the arrangements are sufficient to safeguard our pupils / students, and will include ensuring pupils / students understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

Some overseas pupils may reside with host families during school terms, and we will work with the local authority to check that such arrangements are safe and suitable.

**e) Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

**Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will tell the DSL, and the academy will notify the local authority of the circumstances.**

## Appendix 1: Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

### a) Physical abuse

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

#### a.1 Indicators of physical abuse

The following may be indicators of physical abuse:

- Having bruises, bleeding, burns, bites, fractures or other injuries.
- Showing signs of pain or discomfort.
- Keeping arms and legs covered, even in warm weather.
- Being concerned about changing for PE or swimming.
- An injury that is not consistent with the account given.
- Symptoms of drug or alcohol intoxication or poisoning.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying.
- Isolation from peers.

### b) Emotional abuse

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

### **b.1 Indicators of emotional abuse**

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Inappropriate emotional responses, fantasies.
- Self-harm.
- Drug or solvent abuse.
- Running away.
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

### **c) Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **c.1 Indicators of sexual abuse**

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Aggressive behaviour including sexual harassment or molestation.
- Reluctance to undress for PE or swimming.
- Anal or vaginal discharge, soreness or scratching.
- Bruises or scratches in the genital area.
- Reluctance to go home.
- Refusal to communicate.
- Depression or withdrawal.

- Isolation from peer group.
- Eating disorders, for example anorexia nervosa and bulimia.
- Self-harm.
- Substance abuse.
- Acquire gifts such as money or a mobile phone from new 'friends'.

**d) Neglect**

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

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

**d.1 Indicators of neglect**

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food.
- Frequent tiredness.
- Frequently dirty or unkempt.
- Poor attendance or often late.
- Poor concentration.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones or to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is left at home alone or with inappropriate carers.

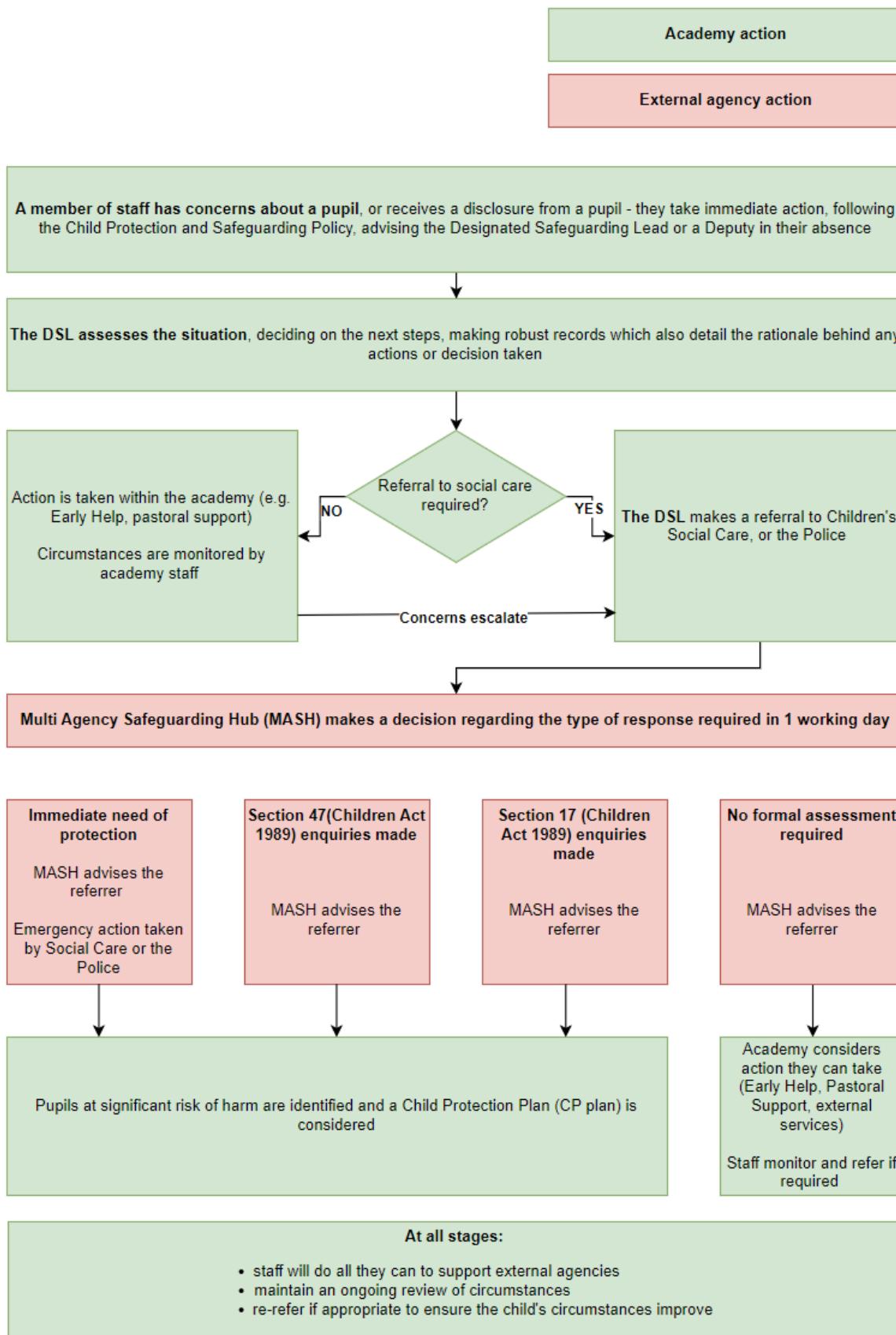
## Appendix 2: Related safeguarding polices

This policy operates in conjunction with the following academy level and trust wide polices:

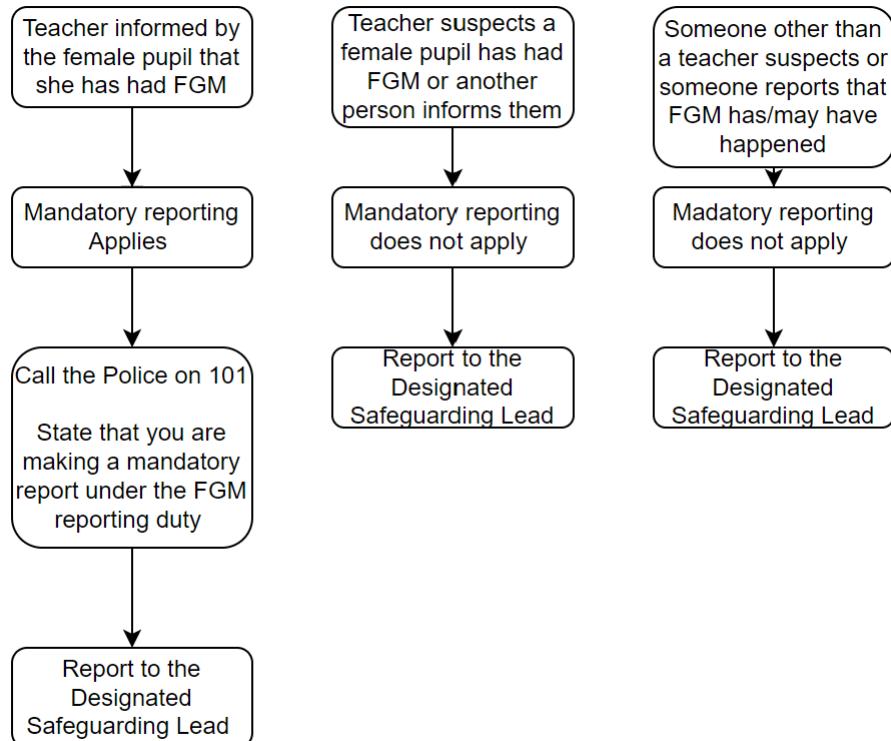
- Suspension and Exclusion Policy
- Online Safety & Security Policy
- Cyber Response Policy & Plan
- Mobile Phones in Schools Policy
- ICT Acceptable Use Policy (Pupil)
- ICT Acceptable Use Policy (Colleagues, Governors & Visitors)
- Data Protection Policy
- Photography and Filming Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Behaviour & Relationships Policy
- Low-level Concerns Policy



## Appendix 3: Process flow for reporting safeguarding concerns

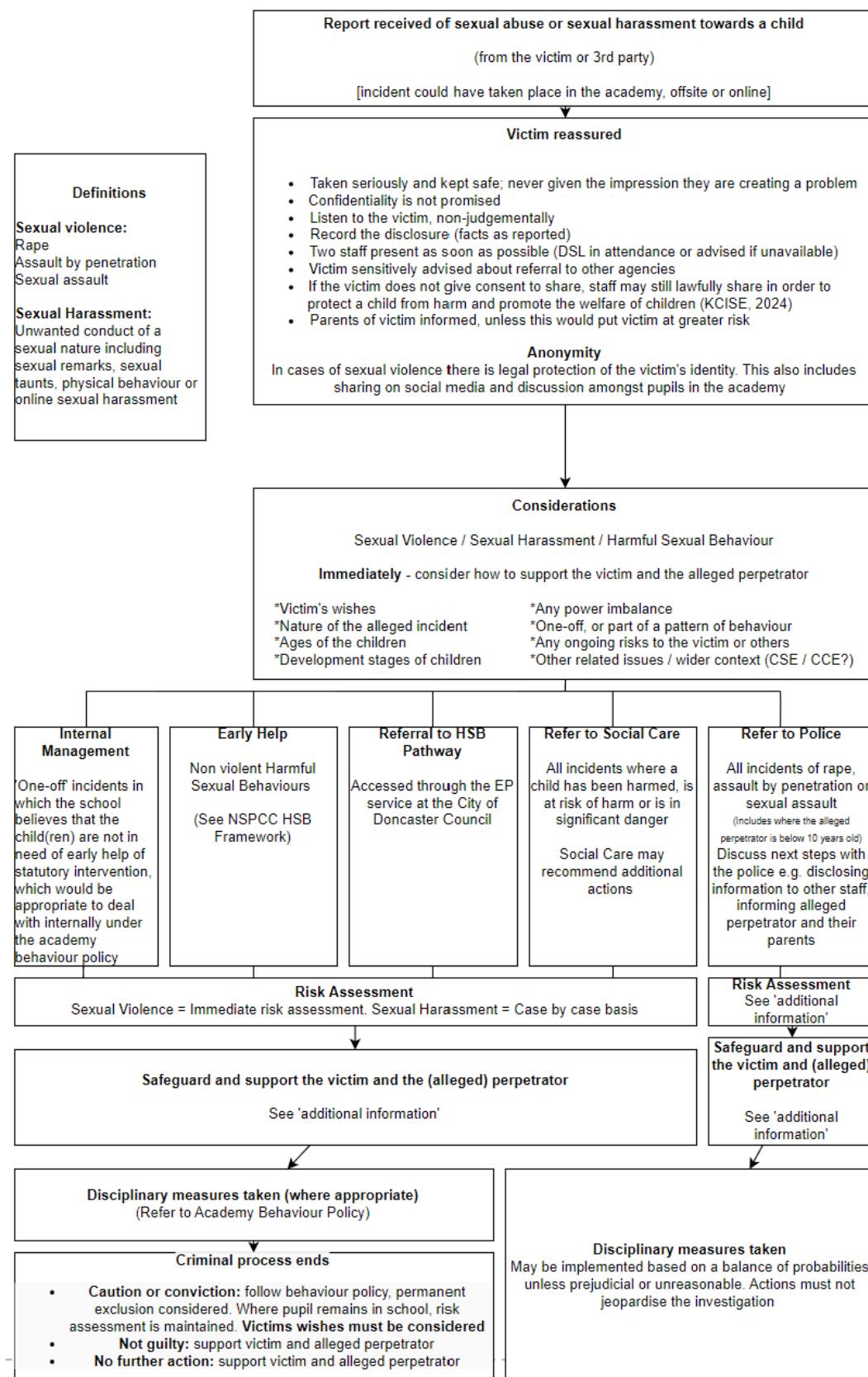


## Appendix 4: Process flow for responding to concerns of FGM





## Appendix 5: Process flow for responding to reports of sexual violence and sexual harassment





## Appendix 6: Additional information for responding to reports of sexual violence and sexual harassment

### Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
<ul style="list-style-type: none"><li>needs and wishes of victim are paramount</li><li>not made to feel they are the problem</li><li>consider proportionality of response</li><li>aim for victim to carry out normal routine</li><li>recognise that they may struggle in class and may need time out (if they wish)</li><li>be aware that they may not disclose the whole picture immediately</li><li>prepare for support over a long period and consider who is involved (internal and external)</li><li>if victim moves school, the Designated Safeguarding Lead (DSL) informs the new school of the need for continued support</li></ul>	<ul style="list-style-type: none"><li>possible tension between discipline and support (these are not mutually exclusive)</li><li>consider age/ developmental stage/any SEND</li><li>proportionate response</li><li>consider unmet needs (for example, harmful sexual behaviours (HSB) in younger children may be a sign or abuse or trauma)</li><li>if (alleged) perpetrator moves school, the Designated Safeguarding Lead (DSL) informs the new school of the issues and transfers the child protection file</li></ul>	<ul style="list-style-type: none"><li>witnesses may need support (especially in cases of sexual violence)</li><li>avoid allowing pupils to 'take sides'</li><li>minimise potential for bullying or victimisation in school and on school transport</li><li>be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed)</li><li>develop safeguarding culture</li><li>constantly review reporting procedures and responses</li><li>consider potential for systematic and environmental weaknesses</li></ul>

## Appendix 7: Designated Safeguarding Lead – Job Description

### Job Description and responsibilities - Designated Safeguarding Lead

The contents of this job description are based on Annex C of the statutory guidance 'Keeping Children Safe in Education' (2025).

#### Rationale:

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the academy leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

#### Deputy designated safeguarding leads

It is a matter for individual academies within the trust as to whether they choose to have one or more deputy designated safeguarding leads. Academies must ensure that there is adequate onsite safeguarding leadership (from either the DSL or DDSL) during all hours where pupils are on site - this should be taken into consideration when deciding how many deputies to have.

Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

#### Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns.

It is expected that during usual circumstances, a DSL or DDSL is available in person in the academy. In exceptional circumstances it may be necessary for a DSL or DDSL to be available via telephone or video call. Where this is the case, this must be agreed by both the DSL and the academy Principal. It is a matter for individual academies and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities

## Management of referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. [NPCC guidance](#) - When to call the police should help understand when to consider calling the police and what to expect when working with the police

## Working with others:

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the Principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).
- as required, liaise with the “case manager” (as per Part four of KCSIE 2025) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
  - work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.

This includes:

- o ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- o supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

## Information sharing and managing child protection files

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely, Exceed academies will use CPOMS to manage their child protection files, ensuring that different children have their own file.

Records should 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

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice set out in Parts one and two of this guidance KCSIE (2025)

Where children leave the academy (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Where electronic transmission by CPOMS is not possible, this should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the academy child protection policy and procedures, especially new and part-time staff
- ensure the academy child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Trust leadership around this
  - ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the academy in this
  - link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
  - help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff

## Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

## Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and

- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

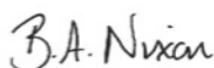
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

### **Holding and sharing information**

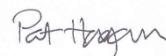
The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this KCSIE (2025), and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the academy, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Policy reviewed: August 2025



Signed CEO:



Signed Chair of Directors:

Policy to be reviewed: September 2026