OAKLANDS PRIMARY ACADEMY

CHILD PROTECTION AND SAFEGUARDING POLICY **V2**

SEPTEMBER 2026

Next Review Date: September 2027

Staff should make themselves aware of all policies and amendments or updates to policies and adhere to the same, which will be made available on relevant websites and internal data and computer systems.

Executive Summary - OAK Child Protection and Safeguarding Policy V2 – September 2026:

- **Safeguarding is everyone's responsibility.** All staff, volunteers, governors, contractors and other adults working with children must remain vigilant, take concerns seriously and act in the child's best interests. This includes school, off-site and extended school activities.

- **Named safeguarding team.** The policy lists Mr J Robinson and Miss M Greenhill as Designated Safeguarding Leads, with Miss S Brotherhood as Deputy DSL. The Headteacher is Mr J Robinson, and the designated mental health lead is Miss M Greenhill.

- **Staff training and awareness.** All staff must read Part One of KCSIE 2026, sign an annual declaration confirming they have reviewed the guidance, and receive safeguarding induction, training and regular updates. DSLs and deputies undertake formal training every two years, with knowledge refreshed at least annually.

- **Reporting concerns promptly.** Staff must speak urgently to a DSL or deputy and record concerns the same day on CPOMS. Volunteers, visitors and external contractors must complete a safeguarding concern form and hand it directly to the safeguarding team. If a child is in immediate danger or at risk of harm, an immediate referral must be made to children's social care and/or the police; anyone can make a referral.

- **Responding to disclosures.** Adults must listen calmly, reassure the child, avoid pressing for details and never promise secrecy. The child's exact words should be recorded, original notes retained and the safeguarding team informed immediately.

- **Recognising abuse and wider risks.** The policy covers physical, emotional and sexual abuse, neglect, domestic abuse, sexual and criminal exploitation, county lines, radicalisation, FGM, forced marriage and other forms of harm. Staff must consider risks at home, in the community and online.

- **Child-on-child abuse.** Bullying, sexual violence, sexual harassment and other abusive behaviour must never be dismissed as "banter". Incidents involving nudes or semi-nudes require a safeguarding response, and staff must avoid unnecessarily viewing, copying or sharing images.

- **Supporting vulnerable children and providing early help.** Particular attention is given to children with SEND, communication difficulties, mental health concerns, social workers or challenging family circumstances. Early help provides coordinated support, with ongoing monitoring and escalation where concerns persist. It must not delay a child protection referral.

- **Safer recruitment and volunteers.** Recruitment arrangements include appropriate vetting, safeguarding interview questions, trained panel members, overseas checks where relevant and accurate records on the Single Central Record. Volunteer roles must be risk assessed; the policy states that volunteers undertaking regulated activity require an enhanced DBS check with children's barred list information regardless of supervision.

- **Additional EYFS requirements.** The policy states that new employees must not begin work before required enhanced criminal-record checks have been received. EYFS safeguarding training must be refreshed at least every two years, alongside the policy's wider training arrangements.

- **EYFS mealtime safety.** A qualified paediatric first aider must be present in the room during all mealtimes, including snacks. The policy also requires at least two adults seated facing the children to provide active supervision and reduce choking risks.

- **Concerns about adults.** Allegations and low-level concerns must be reported to the Headteacher without delay. Concerns about the Headteacher go to the Chair of the Trust Board, or the Vice Chair in their absence. Low-level concerns include inappropriate boundaries, favouritism, humiliating children or photographing pupils on personal phones.

- **Information sharing and secure records.** Relevant safeguarding information must be shared promptly, proportionately and securely. The policy states that parental consent is not required where a lawful safeguarding basis exists. Concerns, decisions, actions and reasons for sharing or withholding information must be recorded, with safeguarding files transferred securely when children move schools.

- **Online safety and pupil images.** Filtering and monitoring systems must undergo a documented review at least annually. The policy addresses AI, deepfakes, harmful content and cyber risks. Pupil images require informed consent, protective measures and regular checks; staff must not photograph or record pupils on personal devices.

- **Attendance, collection and site security.** Unexplained or repeated absence must be followed up as a potential safeguarding concern. Collection procedures include authorised adults, confidential passwords and permission for Year 6 pupils to walk home alone. Visitors, contractors and club providers must follow signing-in, vetting and safeguarding procedures.

- **Oversight and staff support.** Governors and trustees monitor safeguarding through termly reports and an annual audit. Staff can access support following distressing safeguarding cases, and DSLs and deputies receive supervision. The next policy review is September 2027.

CHANCERY EDUCATION TRUST
CHILD PROTECTION AND SAFEGUARDING POLICY

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1. Introduction

All adults (paid or unpaid) in our Academy Schools take all safeguarding concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

At Chancery Education Trust all adults (paid or unpaid) working with children in school fully recognise the responsibility it has for the safeguarding and protection of children regardless of age, gender, language, racial origin, religious belief, sexual identity, culture or disability. They have a right to be safe in all environments. We recognise that children with special educational needs and disabilities can face additional safeguarding challenges.

Our Trust provides a caring, positive, safe and stimulating environment, which promotes the social, physical, emotional, moral and mental development of the individual child. Pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it, in age-appropriate ways.

In order to fulfil these duties, it is our policy to follow the procedures for handling suspected cases of abuse of any child. In this respect, we have a culture of vigilance within the Trust and exercise our professional judgement to keep children safe, act in a timely way and to take proportionate decisions on whether to ask for checks beyond what is required.

This policy is written in accordance with Keeping Children Safe in Education (KCSIE) DfE statutory guidance.

The Academy School will share information where necessary to safeguard and promote the welfare of children. Data protection legislation does not prevent appropriate safeguarding information sharing. Staff should act promptly where sharing information is necessary to protect a child and should follow the Academy School's information-sharing procedures.

Safeguarding records must be accurate, secure, appropriately access-controlled and shared with relevant professionals when this is necessary for safeguarding. Decisions about sharing, including significant risk assessments and safeguarding actions, should be recorded.
The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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.

Terminology:

Safeguarding and promoting the welfare of children refers to the process of protecting all children from maltreatment, preventing the impairment of 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 refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm

Member(s) of staff refers to all individual/s working for the Trust in a voluntary, employed, professional or unqualified capacity

Volunteer refers to individuals who are not employed by the Trust but who work in and/or support the Academy School on a voluntary basis.

Governor/Trustee refers to individuals who sit on the Trust and Local Governing Board and provide strategic leadership and accountability in the academies within the Trust

Child A child is defined as any individual under the age of 18. However, young people who have an Education, Health and Care Plan (EHCP) may continue to receive support and, for the purposes of this policy, will be considered a child up to the age of 25.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents

2. Aims and Objectives

- To keep all children safe and provide an environment in which they feel safe and secure
- To provide a culture of vigilance, professional curiosity, challenge and understanding, ensuring that all adults (paid or unpaid) working with children in school are aware of their roles and responsibilities within safeguarding and child protection.
- To support the child's development in ways that will foster security, confidence and independence.
- To provide a continuous safeguarding training programme for Governors/Trustees, members of staff, volunteers and all adults (paid or unpaid) to ensure that they are fully aware of their responsibilities in identifying and reporting possible cases of abuse and of the need to safeguard children
- To provide a systematic means of monitoring children known or thought to be at risk of harm
- To implement and maintain procedures for identifying and reporting concerns for children in immediate danger or at risk of harm which will be followed by all staff and adults (paid or unpaid) in cases of suspected abuse and /or the need for care
- To develop and promote effective working relationships with other agencies especially the Mental Health/Health Services, Police and Children's Social Care (CSC)
- Support pupils, in accordance with their agreed child protection (CP) plan CIN plan or TAF/TAC plans
- Support children with additional needs, e.g., through an Early Help Assessment
- To ensure that all adults (paid or unpaid) within our Academy School who have access to children have been checked as to their suitability and have an enhanced DBS disclosure with a barred list check
- Ensure the practice of safer recruitment in checking and recording the suitability of Governors/Trustees, members of staff, contractors, external professionals, volunteers and all adults (paid or unpaid) to work with children is robust and in accordance with KCSIE

3. Procedures

Chancery Education Trust follows the procedures set out by the Local Safeguarding Children Board (BSCB/CSCB) and have regard to statutory guidance issues by the Department of Education (DfE) (***including 'Keeping Children Safe in Education' (KCSIE), , Working Together to Safeguard Children, and what to do if a child is being abused***).

- Governors/Trustees, all members of staff, volunteers, contractors and all adults (paid or unpaid) who have access to children have been checked as to their suitability and have an enhanced DBS disclosure (The Disclosure Barring Service) with a barred list check. The Trust will implement safe recruitment

procedures as recommended in ***Keeping Children Safe in Education (KCSIE) DfE***

- All Academy Schools within the Trust have a Designated Safeguarding Lead (DSL) and at least one deputy (DDSL) who will, in line with recommendations in the statutory guidance - ***Keeping Children Safe in Education (KCSIE) DfE,*** *undertake training every two years. In addition to formal training, their knowledge and skills should be updated at regular intervals, but at least annually.* All staff members and adults (paid or unpaid) working with children in school will receive appropriate safeguarding and child protection training, which is regularly updated, as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings)
- All Academy Schools within the Trust have a nominated Governor responsible for safeguarding/child protection
- Members of staff will be kept up-dated on safeguarding issues and will be able to identify concerns and understand procedures to protect and safeguard children and young people. **(see *Appendix 1: Definitions of Child Abuse and Neglect)***
- The Designated Safeguarding Lead will ensure that all adults working with children in school (paid or unpaid) read Part 1 of 'Keeping Children Safe in Education (KCSIE)' DfE, and opportunities are given to discuss and ask questions
- The Trust recognises that children are capable of abusing other children. Child-on-child abuse can take many forms and some types can be gender specific. It can include bullying (including cyberbullying), gender-based violence and assault, upskirting and non-consensual sharing of nude and semi-nude images. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". All concerns will be investigated and recorded on the weekly serious incident report. Refer to the Academy School's Anti-Bullying Policy.
- The Trust recognises that the use of technology has become a significant component of many safeguarding issues and has appropriate filtering and monitoring systems in place and are regularly reviewed for their effectiveness. Refer to the Data Security, E-Safety Policy and Acceptable Use Agreement
- Members of staff and all adults (paid or unpaid) working in school are aware of any immediate/urgent action required to assist the child, e.g. emergency medical treatment and appropriate first aid training is in place.
- Members of staff are aware of the First Day calling system, as outlined in the Pupil Attendance & First Day Calling Policy
- Members of staff and all adults (paid or unpaid) working in school will know how to respond to a pupil who discloses abuse **(*Appendix 2: What to do When a Child Discloses Abuse)***
- Members of staff are aware that children who have additional/unmet needs are supported appropriately. Staff members are aware that this includes referral to early help services or specialist services if they are a child in need or have been / are at risk of being abused and neglected

- All Academy Schools consider the wider environmental factors in a child's life that may be a threat to their safety and/or welfare. This is known as Contextual Safeguarding. The Academy Schools assess the risks and issues in the wider community when considering the well-being and safety of its pupils.
- Parents/carers will be made aware of the Child Protection and Safeguarding Policy which is available on the Academy School's website
- Members of staff are aware of their responsibility for reporting concerns regarding a colleague's behaviour and are aware of their responsibilities within the Trust's whistle-blowing policy
- The Child Protection and Safeguarding policy will be reviewed annually in line with the DfE, the Local Safeguarding Children Partnership (BSCP/CSCP) and other relevant statutory guidance
- All adults (paid or unpaid) working with children in school will have read and understood a copy of this policy and new staff will be given a copy as part of their induction programme
- Governors/Trustees will receive regular reports about numbers of child protection referrals, allegations against staff and other child protection/safeguarding matters, this will be contained within the Headteacher's/Principal's report and presented at both the Local Board Meetings and the Trust Board meetings on a termly basis.
- The section 157/175 Safeguarding Audit is completed annually and shared and ratified with the Local Governing Board.
- The Trust recognises the statutory Information Sharing Duty and will ensure that all safeguarding information is shared lawfully, proportionately, securely and in a timely manner with relevant agencies where doing so may support safeguarding or promote the welfare of a child.
- There is no requirement for safeguarding concerns to meet a threshold of significant harm before information is shared under the Information Sharing Duty. Staff should share relevant information whenever it may assist another agency to safeguard or promote a child's welfare

4. Safer Recruitment (Please refer to the Safeguarding in Recruitment Policy)

Chancery Education Trust will implement their responsibilities for safer recruitment strategies as recommended in ***Keeping Children Safe in Education (KCSIE) DfE.*** This will include:

- Appropriate training for the Headteacher/Principal and others who recruit and select staff and volunteers. These staff will undertake Safer Recruitment training
- Every appointment panel consists of a member who has undertaken safer recruitment training and part of the interview will include questions on safeguarding
- As part of the safer recruitment process all staff being offered positions within the Trust should have their offers made subject to an enhanced DBS check with barred list check

- Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in our Academy Schools. In addition, schools must make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include *criminal records checks* for overseas applicants
- The Trust will obtain a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Where this information is not available, the Trust will seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment (see government guidance *Recruit teachers from overseas*)
- Prohibition Order checks are completed for everyone engaged in teaching whether a qualified teacher or not and then recorded on the Single Central Record
- Agency staff are checked to ensure that they are the same person for whom the agency has provided vetting checks for and a checklist completed
- All Governors/Trustees/volunteers working within the Trust, will be required to undergo pre-appointment checks and may be subject to an enhanced DBS check with barred list information.
- All managers, Trustees and Headteachers/Principals will be subject to a Section 128 check.
- As part of the online vetting process for shortlisted candidates, the following additional measures will be taken:
  - Direct and authoritative references must be obtained for all prospective staff prior to employment, alongside suitability and criminal record checks for all EYFS staff.
  - Any safeguarding concerns identified during employment history checks for EYFS candidates must be thoroughly investigated and followed up before confirming any appointment.

Volunteers

- Before commencement of their role, volunteers must complete the required pre-appointment checks in line with the Trust Volunteer Policy.
- All volunteers must receive safeguarding induction, understand the staff code of conduct and be made aware of reporting procedures before working with pupils.
- The Academy School will risk assess all volunteer roles and determine whether the role constitutes regulated activity.
- For volunteers, activities such as teaching, training, instructing, caring for or supervising children are considered regulated activity where they are carried out frequently, on more than 3 days in a 30-day period, or overnight.
- Volunteers undertaking regulated activity must obtain an Enhanced DBS Certificate with Children's Barred List information before commencing their role.
- KCSIE 2026 removes the previous supervision exemption that allowed some volunteers undertaking regulated activity to avoid barred list checks. Where the activity meets the definition of regulated activity, the

appropriate DBS and barred list checks are required regardless of supervision arrangements.
- Volunteers not engaged in regulated activity will be subject to a risk assessment and appropriate safeguarding measures, which may include an Enhanced DBS check with Children's Barred List information depending on the nature of the role and level of contact with children.

Regulated Activity

The Academy School will determine whether a role constitutes regulated activity in accordance with safeguarding legislation and the requirements of KCSIE 2026.

Regulated activity generally includes unsupervised teaching, training, instruction, care or supervision of children, as well as providing advice or guidance to children on a frequent, intensive or overnight basis.

Any individual undertaking regulated activity will be required to undergo an Enhanced DBS check, including Children's Barred List information, before commencing work with children.

The Academy School will ensure that all decisions relating to regulated activity are appropriately risk assessed and documented, and that an accurate record of safeguarding checks, vetting outcomes and regulated activity determinations is maintained on the Single Central Record (SCR).

5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. Our policy and procedures also apply to extended school and off-site activities.

The Academy School plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of:

- Sexism
- Misogyny/misandry
- Homophobia
- Biphobia
- Sexual violence/harassment
- Racism and race related prejudice
- Religious discrimination and faith-based prejudice
- Disability discrimination and ableism
- Transphobia

This will be underpinned by our:

- Behaviour Policy
- Anti-Bullying Policy
- Equal Opportunities and Diversity policy

- Pastoral support system
- Planned programme of relationships, and health education (RHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5a)

All staff

All staff will:

- All staff must read Part One of KCSIE 2026 in full. The former shortened Annex A has been removed. Staff must understand the safeguarding and child protection issues and procedures relevant to their role and must follow the Academy School's safeguarding systems and reporting arrangements.
- The Academy School will ensure that induction and safeguarding training reflect the 2026 terminology and expectations, including early help, child-on-child abuse, online safety, information sharing, filtering and monitoring, and the safeguarding response to nudes and semi-nudes.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct policy, the role and identity of the designated safeguarding lead (DSL) and deputy designated safeguarding lead (DDSL), the behaviour policy, the data security & e-safety policy, and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL & DDSL, 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 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, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- Their expectations, roles and responsibilities around filtering and monitoring systems, as part of their safeguarding and online safety training
- That some children are at greater risk of harm than others, both online and offline
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT+) can be targeted by other children
- What to look for to identify children who need help or protection
- The statutory Information Sharing Duty introduced by Section 16LA Children Act 2004 and their responsibility to share safeguarding information promptly with the Designated Safeguarding Lead and relevant safeguarding agencies where appropriate.
- That parental consent is not required where safeguarding information is being shared under a lawful basis connected to safeguarding or promoting a child's welfare.
- That requests for safeguarding information received from safeguarding partners, children's social care, police, health services, education settings or other agencies covered by the Information Sharing Duty must be responded to promptly and appropriately.

Appendix 3 of this policy outlines how staff are supported to do this.

5b)

Designated Safeguarding Lead (DSL):

Mr J Robinson, Miss M Greenhill

The Designated Safeguarding Lead is responsible for safeguarding and child protection at their Academy School. The key roles of the Designated Safeguarding Lead are to:

- manage referrals from school staff or any others from outside the school;

- work with external agencies and professionals on matters of Safeguarding and Child Protection;
- undertake training every two years; and in addition to formal training, their knowledge and skills will be refreshed at regular intervals, at least annually;
- raise awareness of safeguarding and child protection amongst the staff and parents; and
- ensure that child protection information is transferred to the pupil's new school
- be aware of pupils who have a social worker*
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers, school leaders and school staff as appropriate

**We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.*

Other areas of DSL responsibility include:

- Adhering to the London Safeguarding Children Procedures, Local Safeguarding Children Board and Academy School policies with regard to referring a child if there are concerns about possible abuse
- Adhering to the statutory guidelines set out in the ***Working Together to Safeguard Children (DfE 2023)***
- Keeping detailed, accurate, written records of concerns about a child even if there is no need to make an immediate referral
- Ensuring all records are kept confidentially and securely and are separate from pupil records
- Ensuring that where a pupil on a child protection plan, or is a child looked after, leaves the Academy School, their information is transferred to the new Academy School immediately and that the child's Social Worker is informed
- Act as a source of support, advice and expertise to members of staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Ensuring that allegations or concerns against members of staff are dealt with in accordance with Department for Education (DfE), and the Local Safeguarding Children Partnership protocols
- Ensuring that details of the child's social worker and the name of the Virtual School Head Teacher (VSH) in the authority that looks after the child is kept on file
- To work with the VSH providing termly progress reports and setting targets regarding each Child Looked After (CLA) and to attend relevant courses specific to role
- Ensure all adults (paid or unpaid) working with children in school have undertaken the appropriate training
- Adhering to the Pupil Attendance & First Day Calling Policy giving priority to any pupil on a Child Protection Plan

- Ensure compliance with the Information Sharing Duty and maintain oversight of safeguarding information shared by the Academy School with external safeguarding partners.
- Ensure that requests for information from safeguarding partners are responded to promptly and that decisions to share, delay or withhold information are appropriately recorded.
- Promote a culture in which staff understand that information sharing for safeguarding purposes is a legal duty and not dependent upon obtaining parental consent.

5c)

Deputy Designated Safeguarding Lead (DDSL):

Miss S Brotherhood

The DDSL is appropriately trained, and in the absence of the DSL, carries out those functions necessary to ensure the on-going safety and protection of pupils.

5d)

Designated Trustee for Safeguarding and Prevent:
Mr F Adu

5e)

Designated Governor for Safeguarding:
R Kushoro

Governors/Trustees must ensure that they comply with their duties under legislation. They must also read *Keeping Children Safe in Education* and other legislation this guidance to ensure that the policies, procedures and training within the Trust is effective and complies with the law at all times.

The broad areas of responsibility for Governors/Trustees are to:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Ensure an effective Child Protection and Safeguarding policy & procedure is in place; updated at least annually and is available on the Trust/Academy website
- Follow safer recruitment practice for recruitment, selection and induction
- Ensure that any allegations against staff are dealt with in accordance with the policy
- Appoint a member of the Senior Leadership Team (SLT) as the DSL to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes that are in place

- Ensure staff (paid or unpaid) working with children in school have been trained appropriately and understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Remedy any safeguarding deficiencies or weaknesses without delay
- Hold the Chair of the Trust Board responsible for managing allegations against the Headteacher/Principal in line with Local Safeguarding Children Partnership procedures and policy

5f)

Headteacher/Principal:

Mr J Robinson

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

All adults (paid or unpaid) working with children in school:

- Are informed of the Academy School systems which support safeguarding, including this policy as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicate the policy to parents/carers when their child joins the school and via the Academy School website
- Ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating 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
- Ensuring the relevant staffing ratios are met, where applicable

5g)

Designated Mental Health Lead:

Miss M Greenhill

6. Supporting Children

- We recognise that children who suffer abuse or witness abuse and violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self-blame
- We recognise that we may provide the only stability in the lives of children who have been abused or who are at risk of harm
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to that which may be aggressive or withdrawn

- We are aware of child-on-child abuse and of the many ways in which it may manifest itself and of the different gender issues that can be prevalent
- We are aware that additional barriers can exist when recognising abuse and neglect in children with SEN and disabilities, as this group of children are more likely to be impacted by bullying, and to have communication barriers
- We recognise that children and young people may experience mental health difficulties and require a range of support (medical and non-medical)
- We are able to respond to pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them going missing in future (CSE, CCE)
- We are able to recognise children who may be susceptible to being drawn into extremism and terrorism, to challenge extremist ideas which can be used to legitimise terrorism and to know when and how to make a referral to the relevant agencies.
- We understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- The Academy School will ensure that relevant staff and volunteers meet the EYFS safeguarding and welfare requirements, including enhanced criminal-record and barred-list checks where required. New employees must not begin work before the required enhanced criminal-record check, including barred-list information where applicable, has been received.
- The Academy School will maintain appropriate safeguarding training. EYFS safeguarding training must be refreshed at least every two years, with annual refresher training considered where appropriate to the setting and workforce.

Support will be given to all pupils by:

- Providing a consistent culture of listening, caring and acting
- Encouraging self-esteem and self-assertiveness while not condoning aggression or bullying
- Promoting a caring, safe and positive environment
- Liaising and working together with all other support services and those agencies involved with the safeguarding of children
- Notifying Children's Social Care as soon as there is a significant concern, to seek advice and next steps
- Providing continuing support to a pupil, about whom there have been concerns, who leaves the Academy School, by ensuring that appropriate information is forwarded to the pupil's new Academy School under confidential cover
- Establish and maintaining an ethos where children feel secure and are encouraged to talk and are always listened to
- Ensure all children know there are adults in the Academy School whom they can approach if they are worried or in difficulty
- Accessing a curriculum which equips children with the skills they need to stay safe from harm, how to identity harm, what to do in situations and to know whom they should turn to for help if they feel their safety is threatened

7. Supporting Staff

- Dealing with a disclosure from a child, and safeguarding issues can be stressful and upsetting. We recognise that members of staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting
- We will support staff by providing an opportunity to talk through their experiences with the DSL and to seek further support as appropriate
- The Trust provide a Welfare Assured Programme
- The Trust provide supervision for DSL's and DDSL's

8. Allegations Against Staff, Volunteers, People working with children

We recognise the possibility that adults working (paid or unpaid) in the Academy School may harm children, including governors, volunteers, supply teachers, agency, contracted adults and staff. Any concerns about the conduct of other adults in the Academy School should be taken to the Headteacher/Principal without delay; any concerns about the Headteacher/Principal should go to the Chair of the Trust Board who can be contacted via the Trust office. In the absence of the Chair of the Board, the Vice Chair should be contacted.
An allegation or concern is any information that indicates that an adult working in the Academy School whether as a teacher, supply teacher, other staff, volunteers or contractors may have:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Headteacher/Principal has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below). This will be discussed with the LADO as appropriate.

All adults (paid or unpaid) will follow the guidelines set out in ***Keeping Children Safe in Education (KCSIE) DfE***, our Local Safeguarding Children Partnership protocols for managing allegations and the Trust's Allegations of Abuse Against Adults working in our Academy Schools Policy. If parents or carers of a child or children involved are not already aware of the allegation, the LADO will discuss how and by whom they should be informed. The person who is the subject of the allegations will be kept informed of the progress of the case and consideration will be given as to what other support is appropriate for the individual.

Low-level Concerns (Please refer to the Allegations of Abuse Against Adults working within our Academy Schools incorporating Low-level

Concerns Policy)

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- humiliating children; or,
- using inappropriate sexualised, intimidating or offensive language.

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

9. Reporting Concerns

Concerns:

If members of staff have any concerns (as opposed to a child being in immediate danger) about a child, they should raise these with their DSL/DDSL verbally as a matter of urgency.

Staff must record their concerns the same day on CPOMS. Volunteers, External Contractors and Visitors must use the Safeguarding Record of Disclosure Form available in the Staff Room/School Office ***(Appendix 5: Safeguarding Record of Disclosure Form for External Contractors and Visitors)***

After discussion with another member of the safeguarding team, the DSL will make a referral to LA children's social care or next steps.

The DSL/DDSL has a duty to feedback to that person any action taken as a result of their concern.

Immediate Danger or a Risk of Harm:

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral; however, the DSL should be informed as soon as possible.

All referrals should be sent to the Local Children's Referral & Assessment Team using the Children & Young People Services: Children's Social Care referral online form. The exception is in the case of urgent child protection, where the referral will be taken over the telephone and followed up in writing by the next working day (24 hours). With few exceptions the parents should be informed a referral is being made. If you are unsure consult a Duty Social Worker prior to sending the referral. ***(Refer to Appendix 3:*** **Flow Chart for Raising Safeguarding)**

The social worker/assessment team should be notified of this.

Concerns About a Child and *Appendix 11: Information Sources and Key Contacts)*

NOTE: IN THE ABSENCE OF THE DSL, STAFF SHOULD SPEAK TO THE DDSL

10. Early Help

The goal is to develop a plan to get the right support at the right time to prevent problems from worsening. The Early Help Assessment involves multiple agencies sharing information in a coordinated way, with a designated "***Lead Professional***" serving as a single point of contact for the family.
You might use an EHA:

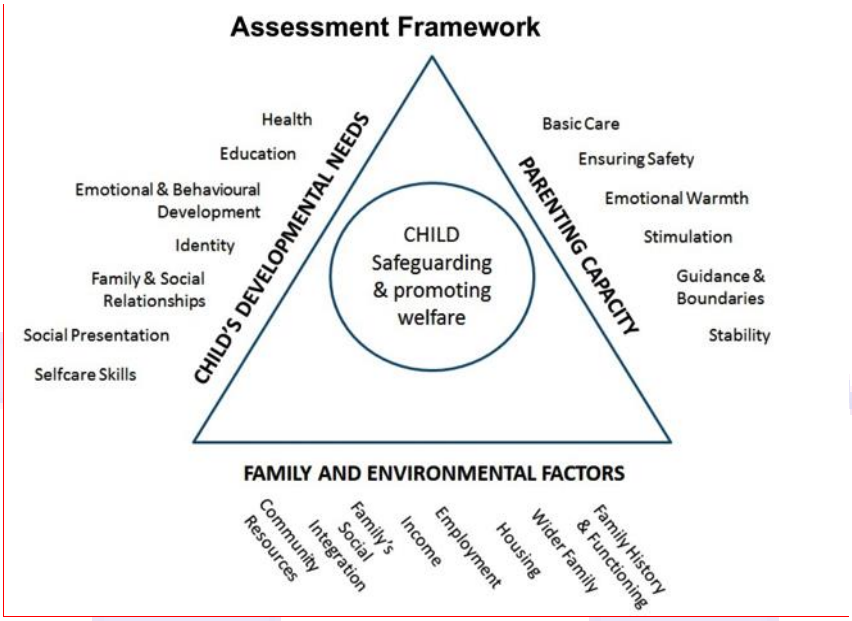
- If you are concerned about how the child/young person is progressing in terms of their health, welfare, behaviour, learning or any other aspect of their wellbeing
- You receive a request from the child/young person or parent/carer for more support
- You are concerned about the child/young person's appearance or behaviour, but their needs are unclear or are broader than your service can address
- You want to use an EHA to help you identify the needs of the child/young person and/or to pool knowledge and expertise with other agencies to support the child/young person better.

Early Help Assessment (EHA) Referrals
Referrals for Early Help support should be submitted via the appropriate local authority's online portal:

Bromley: Referrals must be made through the Bromley Early Help Assessment portal, accessible at Bromley EHA Portal.
https://www.bromley.gov.uk/downloads/download/501/early-help-assessment-eha

Universal services and community-based early help should be considered where appropriate, alongside targeted early help at the Family Help level where a child and family require additional support.

Early help is part of the continuum of support and does not replace a safeguarding referral where a child is suffering, or is likely to suffer, significant harm. Staff must immediately refer safeguarding concerns to the DSL and follow local safeguarding arrangements.



Identifying Children and Families who would benefit from early help

Members of staff should be aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL any on-going/escalating concerns so that consideration can be given to a referral to the Children & Young People Services if the child's situation doesn't appear to be improving.

Members of staff working within the Trust should be alert to the potential need for early help for all children but even more so for those children who are more vulnerable. For example:

- Children with a disability and/or specific additional need
- Children with a special educational need
- Children who are acting as a young carer
- Children who are showing signs of engaging in anti-social or criminal behaviour
- Children whose family circumstances present challenges, such as substance abuse, adult mental health or learning disability, domestic violence
- Children who are showing early signs of abuse and/or neglect.

Members of staff should be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect**. They should also be aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection.

For further information refer to the guidelines set out in ***Working Together to Safeguard Children (DfE 2023) Assessing Need and Providing Help.***

11. Record Keeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. When a child has made a disclosure, the member of staff should immediately discuss with the DSL/DSL and then:

- Record the conversation the same day on CPOMS. External Contractors and Visitors must use the Safeguarding Record of Disclosure Form ***(Appendix 5: Safeguarding Record of Disclosure Form for External Contractors and Visitors)***
- Ensure notes are detailed, legible and accurate
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child on both the abuse report and also the writing of the report
- Use the Body Map diagram to indicate the position of any injuries ***(Appendix 10: Child Protection Body Map)***
- Record statements and observations rather than interpretations or assumptions
- Do not destroy the original notes, keep all handwritten notes even if subsequently typed up in case they are needed by a court
- All records need to be given to the DSL promptly. The member of staff should not retain any copies
- The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.
- If a pupil who is/or has been the subject of a child protection plan leaves the Academy School the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving Academy School, in a secure manner, and separate from the child's academic file
- Records must clearly document any safeguarding information shared under the Information Sharing Duty, including what information was shared, with whom, when it was shared, the purpose of the sharing, and the rationale for any decision not to share information.

12. Case Conferences

- If invited to a Child Protection Case Conference, staff will be given priority to attend
- A full report should be made using the multi-agency conference report format available from the Local Safeguarding Children Partnership. This report should be made available to the Chair and other attendees two working days in advance of the conference and five working days for a review conference
- The outcomes of case conferences should be discussed with the relevant staff and information sharing as appropriate

13. Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all members of staff.

- The Information Sharing Duty provides a lawful basis for sharing safeguarding information. Disclosures made in accordance with this duty do not breach obligations of confidence, professional confidentiality requirements, data protection legislation or any other restriction on the sharing of information where the purpose is safeguarding or promoting the welfare of a child.
- We recognise that all matters relating to Child Protection and Safeguarding are confidential
- The Headteacher/Principal or the DSL will disclose any information about a pupil to other staff on a 'need to know' basis only
- All members of staff must be aware that they have a professional responsibility to disclose information with other agencies in order to safeguard children
- All members of staff must be aware that they cannot promise a child complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.
- Members of staff who receive information about children and their families in the course of their work should share that information only within an appropriate professional context and with permission from the Headteacher/Principal

14. Child Collection

Parent/Carers will need to complete the 'List of People Authorised to Collect Your Child' Form that notifies the child's class teacher of people who are authorised to pick up the child at the end of the day. Parents/Carers should also use this form to make teachers aware of any clubs that their child attends and of the person authorised to collect them. Parents/Carers should provide a password for collection that must be kept confidential and only be known by the appropriate adult.

All staff will carry out a 1:1 handover with regular parents/carers notified on the form. Any persons collecting who are unknown to the member of staff handing over will be asked for this confidential password. For those Academy Schools with Year 6, parents who have a child in Year 6 must indicate on the form that they have given permission for the child to walk home alone.

In the event of an emergency that requires a change of plan, parents/carers must notify the Academy School office during the day so that the child can be made aware and the class teacher knows who to expect for collection. Parents/Carers will be taken through some security questions when phoning.

15. Site Security

Visitors to the Academy School, including contractors, are asked to sign in and are given a lanyard, which confirms they have permission to be on site. The flowchart for visitors/contractors is adhered to. Once visitors/contractors have

been checked they are given Safeguarding and Health and Safety information to read before entry.

Parents/carers who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the Academy School's Child Protection and Safeguarding policy and health and safety regulations to ensure children are kept safe.

16. Extended Academy School Activities Arrangements

Where extended Academy School activities are provided by and managed by the Academy School, the organisation will be required to complete an Application for the Use of Education Premises Form, comply with the Lettings Policy and will have an obligation to adhere to the terms and conditions set out to the hirer. Organisations will be required to provide a copy of their DBS for all members of staff involved, and other documents including First Aid, Public Liability Insurance and their own Safeguarding policies. All organisations will be given copies of the Academy School's Child Protection & Safeguarding Policy **and will need to sign to say that they have read and understood this as part of the Lettings policy and procedures. Please see appendix 7 for club/contractor safeguarding procedures and refer to the Lettings policy which is available on the Academy School website.** All organisations must adhere to the DfE's safeguarding guidance for providers: DfE After-school clubs, community activities, and tuition

17. Filtering and Monitoring

- The Academy School will maintain effective filtering and monitoring systems and will carry out a safeguarding-led review of their effectiveness at least annually. The review will be documented, with identified weaknesses addressed and actions recorded.
- The Academy School will consider risks arising from generative AI, including inaccurate or harmful content, manipulation, deepfakes, inappropriate material and safeguarding risks arising from children's use of AI tools. Staff will receive appropriate guidance on safe and responsible use.
- The Academy School's online-safety arrangements will also address mobile-device use, information security, cyber risks and the ability of pupils to access or share harmful material.

To support this, we aim to:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place that meet our pupils safeguarding needs

- Recognise and respond to emerging digital threats, including the misuse of artificial intelligence (AI), deepfakes, misinformation, and conspiracy theories, which may pose risks to children's safety, wellbeing, and understanding of the world around them

18. Use of Images and Digital Media

The Academy School recognises that the use of pupil images is an important part of celebrating achievement and documenting school life; however, it also presents safeguarding risks, particularly in the context of evolving technologies such as artificial intelligence (AI). Images shared online may be copied, altered, or redistributed without consent, potentially leading to misuse, exploitation, or privacy breaches.

In response, the Academy School adopts a safeguarding-first approach to the use of images. This includes minimising the identifiability of pupils (e.g. using group images, distance shots, or alternative angles), avoiding the publication of full names or personal information alongside images, and applying appropriate privacy settings to limit access. The Academy School will ensure that all images are checked to remove metadata that could reveal sensitive information such as location or routines and may use lower-resolution images or other protective measures to reduce the risk of misuse. As part of this, our IT department will be consulted to provide ongoing advice on security and safety, ensuring that our approach remains robust and up to date.

19. Consent, Monitoring and Safeguarding Response

The Academy School will obtain informed consent from parents/carers (and pupils where appropriate) for the use of images, with clear information provided about how images may be used and the associated risks. Consent will be reviewed and may be withdrawn at any time. The Academy School will carry out routine audits of images published on websites, social media, and other platforms to ensure they remain appropriate, necessary, and in line with permissions granted; images that are no longer required will be removed promptly.

All staff will receive training on safe image use and the recognition of image-based safeguarding concerns, including potential misuse, manipulation, or blackmail. Any incidents involving the misuse of pupil images will be treated as a safeguarding concern, managed in accordance with the Academy School's child protection procedures, and reported to relevant authorities where appropriate. The Academy School is committed to working in partnership with parents and carers to ensure transparency and to uphold the safety, dignity, and wellbeing of all pupils.

20. Private Fostering

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the Academy School, we will take steps to verify the relationship of the adults to the child who is being registered.

Are children in private foster care defined as 'Children Looked After'

A child looked after (CLA) is a child who is:

(a) in the care of a local authority or being provided with accommodation by a local authority in the exercise of their social services functions. These children must still be "CLA" when the child starts school unless (b) applies.

(b) or a child who was previously looked after but immediately after being looked after became subject to an adoption, child arrangements, or special guardianship order (90) including those who appear [to the admission authority] to have been in state care outside of England and ceased to be in state care as a result of being adopted.

Appendix 1: Definitions of Child Abuse, Neglect, and Preventing Radicalisation

Abuse:

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

Physical Abuse:

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 fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse:

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Signs of Emotional Abuse:

- Physical, mental and emotional development lags
- Admission of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour, rocking, hair twisting, thumb-sucking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging

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 (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue **(see child-on-child abuse)**

Signs of Sexual Abuse:

- Sudden changes in behaviour or academic performance
- Displays of affection in a sexual way inappropriate to age
- Tendency to cling or need constant reassurance
- Tendency to cry easily
- Regression to younger behaviour, such as thumb-sucking, playing with discarded toys, acting like a baby
- Complaints of genital itching or pain
- Distrust of a familiar adult, or anxiety about being left with a relative, a baby-sitter or lodger
- Unexplained gifts or money
- Depression and withdrawal

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, maternal mental ill health or learning difficulties or a cluster of such issues. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including 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

Signs of Neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing

- Emaciation
- Frequent lateness or non-attendance
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviours
- No social behaviours
- Running away
- Compulsive stealing or scavenging

Children Who Are Absent From Education:

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identifying the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Children Missing in Education:

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents are required to update the Academy School as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education the Academy School has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
    - leave school to be home educated
    - move away from the school's location
    - remain medically unfit beyond compulsory school age
    - are in custody for four months or more (and will not return to school afterwards); or
    - are permanently excluded

We will ensure that pupils who are expected to attend the Academy School but fail to take up the place will be referred to the local authority.

When a pupil leaves the Academy School, we will record the name of the pupil's new school and their expected start date. Information will be handed to the Education Welfare Officer of the current Borough and new Borough.

Children are not 'off rolled' until confirmation from the new school, Education Welfare Officer that they are registered and on roll at a new school.

Staff should be aware of their Academy School's Attendance and Attendance & First Day Call Procedure and the Borough's Children Missing in Education Policy includes local procedures (Bromley CME).

Child Criminal Exploitation (CCE)

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

(a) in exchange for something the victim needs or wants, and/or
(b) for the financial or other advantage of the perpetrator or facilitator and/or
(c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Child-on-child Abuse:

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

Our Academy School has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their

designated safeguarding lead (DSL) or deputy designated safeguarding lead (DDSL) without delay.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse';
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery). In cases where nudes or semi-nudes have been shared, we follow guidance given to schools by the ***UK Council for Internet Safety (UKCIS): Sharing nudes and Semi-nudes (December 2020);***
- 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; and
- 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)

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed above, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as 'just banter', 'just having a laugh', 'part of growing up', or 'boys being boys', can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalise abuse leading to children accepting it as normal and not coming forward to report it. ***Keeping Children Safe in Education (KCSIE) DfE.***

The Academy School recognises that child-on-child abuse can include sexual violence, sexual harassment, physical abuse, emotional abuse, bullying, coercive or controlling behaviour, misogyny, misandry and other harmful conduct.
The Academy School will respond to the making or sharing of nudes or semi-nudes as a safeguarding matter. All incidents require an appropriate safeguarding response, including consideration of the child's welfare, consent, coercion, exploitation, age, vulnerability and whether other safeguarding issues are present.
Staff must not view, copy, print, forward, store or otherwise distribute an image unnecessarily. Staff should follow the Academy School's safeguarding response and seek advice from the DSL promptly.

Equally, abuse issues can sometimes be gender specific e.g. girls will be victims and boys' perpetrators, but all child-on-child abuse (including harassment and violence) is unacceptable and will be taken seriously. It is important to consider the forms abuse may take and the subsequent actions required.

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 Appendix 3 of this policy, as appropriate.

Abuse is abuse and should never be tolerated.

Refer to the Academy School's Anti-Bullying Policy for further information.

Child Sexual Exploitation (CSE):

The statutory definition of Child Sexual Exploitation (CSE) (DfE 2017)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from children/social networks;
- Exclusion or unexplained absences from school, college or work;

- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or young people);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:
Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Children with special educational needs or disabilities (SEND) at risk of safeguarding challenges

We recognise that children with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

These can include:

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

Additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- assumptions that children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any sign
- communication barriers and difficulties
- reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- a disabled child's understanding of abuse
- lack of choice/participation isolation
- particular vigilance must be paid to those children with hearing impairment

At our Academy Schools, we provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place, for example signing, Makaton, specialist adult support. Children with learning disabilities are more vulnerable to Child Sexual Exploitation (CSE) than other children, facing additional barriers to their protection and to receiving support.

Robust procedures will be implemented to ensure thorough vetting and ongoing monitoring of all off-site placements arranged for pupils within our Additional Resource Provision (ARP). This includes regular safeguarding checks, quality assurance visits, and clear communication protocols with external providers to uphold the highest standards of pupil welfare and educational support

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".'

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Domestic Abuse:

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

a) physical or sexual abuse;
b) violent or threatening behaviour;
c) controlling or coercive behaviour;
d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted)

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 sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Drug/alcohol abuse:

If a parent or carer appears to be under the influence of alcohol or drugs or to be totally distressed and unable to provide appropriate supervision for their child when they collect them, the DSL, Headteacher/Principal will be notified immediately and will make a decision as to whether CSC should be contacted and the child does not go home with the parent/carer.

Female Genital Mutilation (FGM):

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Any adult working in school (paid or unpaid) must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the Designated Safeguarding Lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

If any member of staff receives a disclosure or is aware that a FGM is about to happen this must be disclosed to the DSL without delay so that the appropriate referrals may be made and/or protective measures may be put in place, especially as the child/ren may be taken out of the country.
Refer to guidelines set out in Keeping Children Safe in Education DfE, Annex B

Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Academy School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead and the trained Mental Health Lead. ***(See Pupil Mental Health & Well-being Policy).***

Online safety and the use of mobile technology (*See Data Security & E-Safety Policy, and Mobile Phone and Smart Technology Policy*)

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. We also understand that some children are at greater risk of harm than others, both online and offline.

To address this, our Academy School aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Have appropriate filtering and monitoring on school devices and school networks
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our Academy School's policy on online safety and the use of mobile phones, please refer to our Data Security and E-Safety

policy and Mobile Phone and Smart Technology policy, which you can find on our website.

Preventing Radicalisation:

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as 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 School being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
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 susceptible to 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 the following procedures:

- 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. Inform the DSL or deputy as soon as practically possible 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 DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a 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

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

Recognising Extremism

Radicalisation can be really difficult to spot. Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures

- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and child relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Children who are susceptible to radicalisation may have low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family.

Any concerns should be discussed with the DSL, who will discuss with the MASH team, police or CHANNEL referral (An individual will be required to provide their consent before any support delivered through the CHANNEL programme is provided).

However, these signs don't necessarily mean a child is being radicalised – it may be normal teenage behaviour or a sign that something else is wrong.

All staff, visiting staff, volunteers' contractors, and students on placement are required to report instances where they believe a child may be at risk of harm or neglect to the DSL, or in their absence the DDSL including any harm through extremism or radicalisation.

Always put your concerns in writing then you have evidence that you have sent a concern. Include as much information as possible. When using email, a secure email should be used such as Egress. Alternatively, documents should be password protected with the password sent separately. ***(Refer to Appendix 11: Information Sources and Key Contacts)***

Serious violence

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

networks or gangs.

Sexual Violence and Sexual Harassment (in line with *Keeping Children Safe in Education (KCSIE) DfE*)

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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 or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims 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. Detailed advice is available in Part five of this guidance

The Department of Education has published detailed guidance on how schools and colleges should respond to reports of child-on-child sexual violence and harassment in part 5 of Keeping Children Safe in Education (KCSIE) DfE. **(Refer to Appendix 4: Flowchart for incidents of sexual violence and sexual harassment)**

So-called 'honour-based' violence

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

It is a crime 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.

Where staff are concerned that a child might be at risk of HBA, they must contact their DSL as a matter of urgency.

Upskirting

'Upskirting' is a criminal offence and will not be tolerated in our Academy School. Upskirting refers to the act of taking a photograph or video under a person's clothing without their consent, typically with the intention of viewing their genitals, buttocks, or underwear. This behaviour is a serious invasion of privacy and is now a specific criminal offence under the Voyeurism (Offences) Act 2019 in England and Wales. Offenders can face up to two years in prison and, in serious cases, be placed on the sex offenders' register. Upskirting can cause significant emotional distress and humiliation to victims, and any such incidents within the school environment will be treated with the utmost seriousness and reported to the appropriate authorities. All students and staff must understand that this behaviour is not a joke or prank—it is illegal and harmful.

Nutrition and Mealtimes – EYFS Setting

A qualified paediatric first aider must be present in the room during all mealtimes, including snack times and lunch periods, to ensure immediate response in case of medical emergencies.

All Early Years settings within the Trust must implement clear seating and supervision protocols to minimise the risk of choking:

A minimum of two adults to be seated facing the children during mealtimes to provide active supervision and prompt intervention if needed.

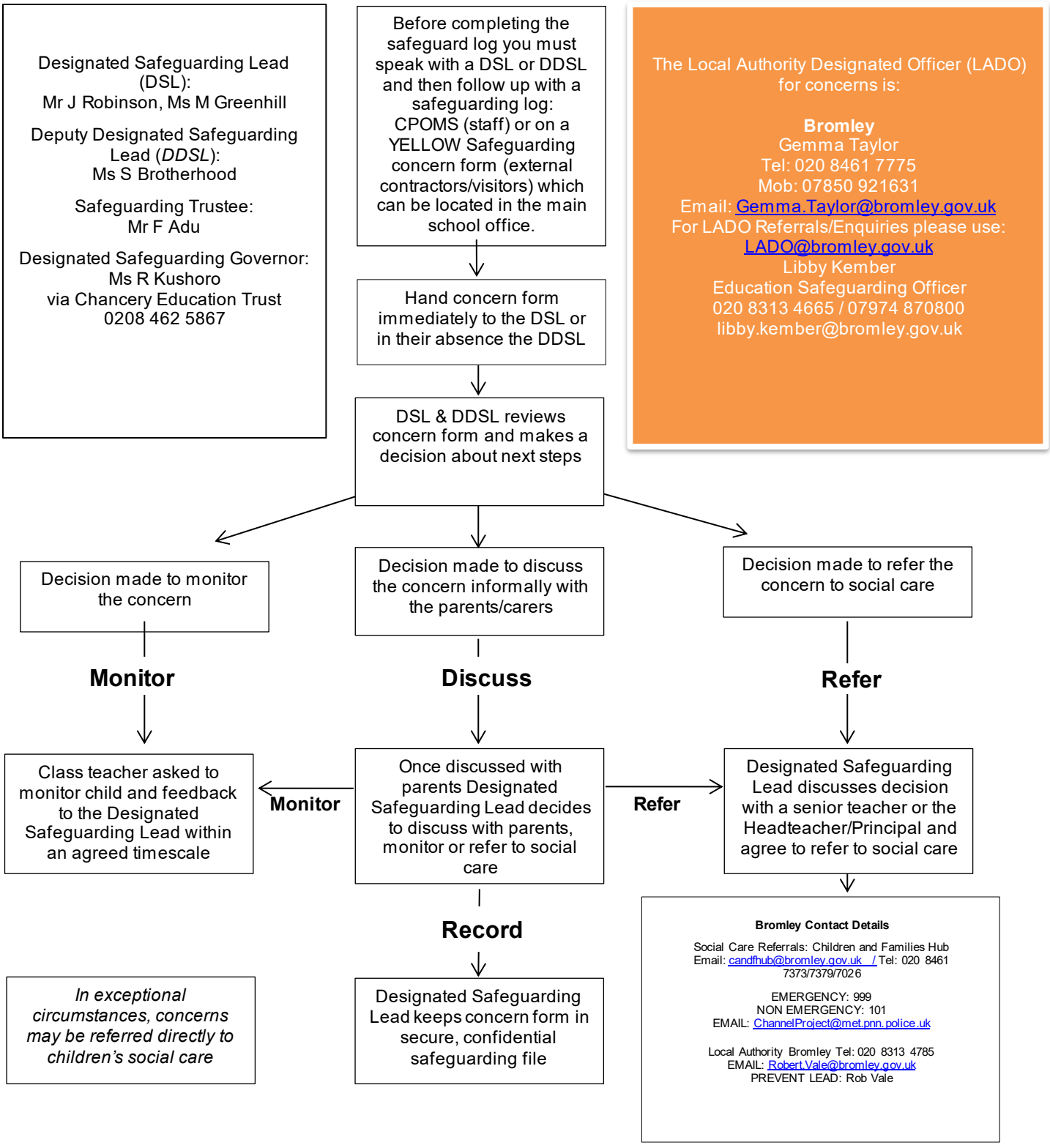
Appendix 2: What to do When a Child Discloses Abuse

- Stay calm and reassuring
- Listen to what the child says
- Explain that you cannot promise to keep what the child tells you a secret - you will have to share this with trusted adults
- Don't make any other promises to the child - the situation may cause you to react emotionally
- Listen and reassure
- **Do not press for details** - this is likely to need further and possibly extensive investigation. It is better for the child if s/he does not have to repeat the details unnecessarily. This could also compromise a potential criminal investigation
- Tell the child that s/he was right to tell - that s/he is not to blame for the incident. Let the child know that you understand how difficult it is to talk about such experiences. Thank the child
- Debrief with your DSL/DDSL immediately
- As soon as possible afterwards, record your conversation with the child. Remember the child's exact words. **Academy School Staff:** Record your own statements to the child using the CPOMS software under safeguarding and inform the DSL immediately verbally.
  Visitors/Volunteers/Governors/Trustees/Trust Staff: Use the *Safeguarding Concern Form* set out in Appendix 5. This form should be completed and handed to the DSL immediately.
- Ensure that all handwritten notes are retained, do not throw them away, as they may be required as evidence in court

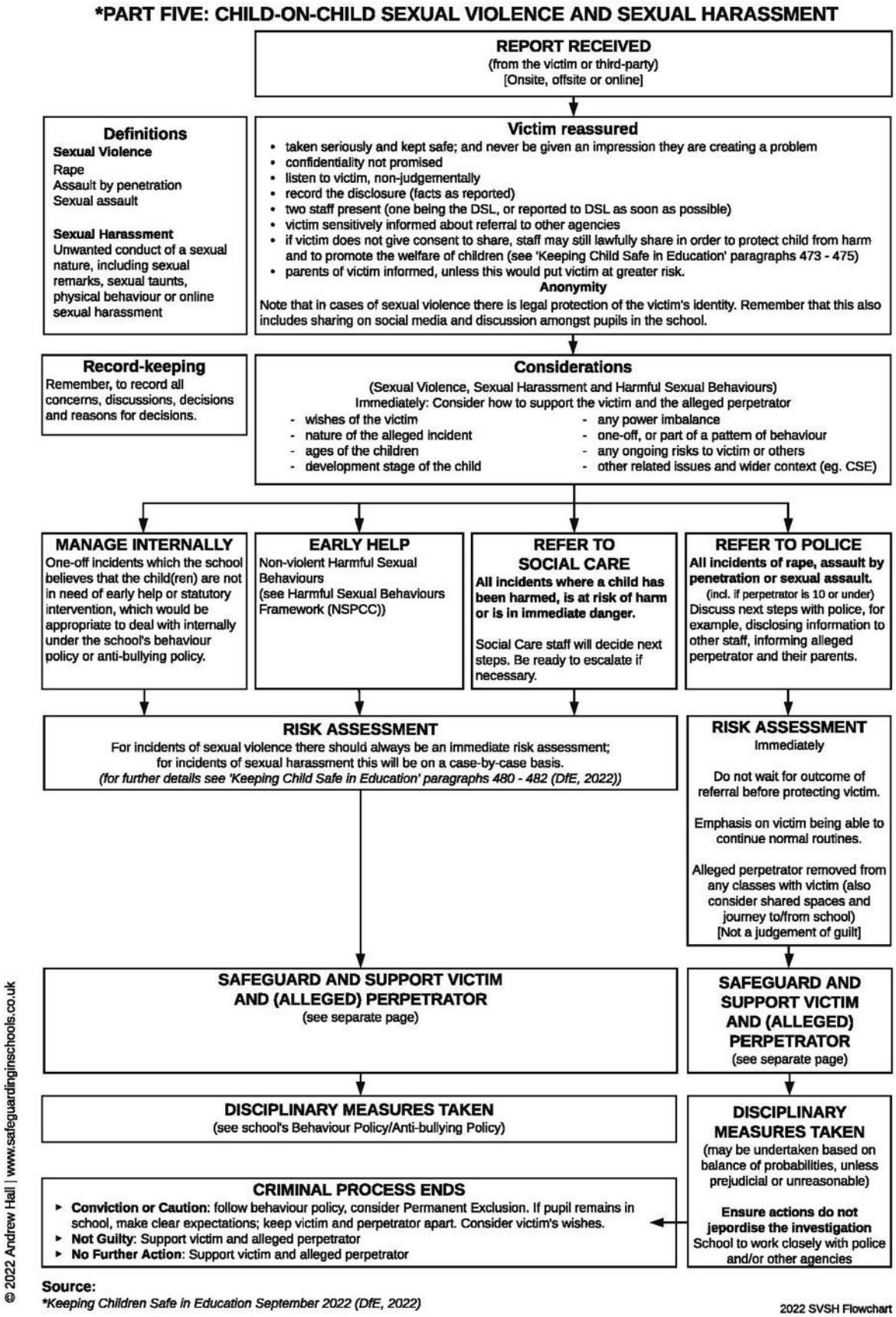
A wide range of situations can fall into the category of "disclosure". Because it is impossible to know in advance what a child will say, it is advisable to always follow these suggestions. Many victims of child abuse say that having the first person they told be supportive was the first step in recovering from their experience. It isn't easy to give precise guidance about helping a child who wants to talk about abuse, but the following may be of help:

- Accept what the child is saying
- Keep calm
- Look the child in the eye
- Be honest
- Let the child know you'll need to tell someone – don't promise confidentiality
- Even when a child has broken a rule, he/she is not to blame for the abuse
- Be aware that the child may have been threatened
- Never push for information

Appendix 3: Flowchart for Raising Safeguarding Concerns About a Child



Appendix 4: Flowchart for incidents of sexual violence and sexual harassment



Appendix 5: Safeguarding Concern Form for External Contractors / Visitors use (Staff are to log their concerns on CPOMS)

(Please use BLOCK CAPITALS and complete in ink)

Pupil Name			
Day/Date/Time		DoB	
Member(s) of staff noting concern			

Concern (Please describe as fully as possible) Signature: Date:

Actions Taken			
Date	Person taking action	Action	Signature

Would you like feedback about this concern? ☐ Yes ☐ No Date Given.....

Please pass this form to Mr J Robinson or in his absence Ms M Greenhill, Ms S Brotherhood

Appendix 6: Guidance on Completing Concern Forms (External Contractors and Volunteers)

It is important that concern forms are fully completed in a timely way. The details are important. To help the DSL respond appropriately, please follow the guidance below.

- Use ink, not pencil, cross through errors and never use corrective fluid
- Enter all the admin details, including date of birth (This will be required when a concern is reported to Children's Services or the police)
- Include your full name (not initials)
- Make sure the concern is given in detail, preferably in the child's own words
- Don't report what other people have told you - they must write their own concern form
- Only write about one child on each concern form (use a separate form for each child)
- Remember that concern forms are used in court cases and inquests as primary documents, so they must be complete and accurate.
- Make sure you use a concern form to record your concern. Do not use any other form or piece of paper. Writing on the back of other forms can cause confusion and error
- If you jotted your notes down on a piece of paper whilst talking to the student or immediately afterwards, attach that to the completed concern form
- If there are no concern forms available, please refer to the DSL or in their absence, the DDSL
- Do not use email to send your concern, complete a hard copy concern form instead and hand to the DSL/DDSL.
- Please alert the safeguarding team to concerns as soon as possible. It can take several hours to deal with even urgent concerns and the earlier we start the better
- Finally, please sign, date and time the concern form.
- Completed concern forms must be handed to the DSL or in their absence, the DDSL immediately for sign off and escalation. Do not leave in trays.

Guidance on Completing Safeguard Reports (CPOMS)

You must speak with a DSL or DDSL before you write the report onto CPOMS:

- Include your full name (not initials)
- Make sure the concern is given in detail, preferably in the child's own words
- Don't report what other people have told you - they must write their own report
- Remember that reports are used in court cases and inquests as primary documents, so they must be complete and accurate.
- If you jotted your notes down on a piece of paper whilst talking to the student or immediately afterwards, upload this to CPOMS

Appendix 7: Club/Contractors Safeguarding Procedures

All visiting staff must adhere to the following safeguarding procedures whenever attending the Academy School site:

1. Signing In and Out

- All staff must sign in at the main entrance upon arrival
- They must make themselves known to Academy School staff
- At the end of the visit, staff must sign out and notify Academy School staff of their departure

2. New or Supply Staff

If you are sending new or supply staff to the Academy School:

- You must send their details in advance of their visit to the school's designated SCR (Single Central Register) officer using Vetting Form A (please refer to the CET Safeguarding in Recruitment policy)
- On their first visit, they must bring:
    - Their original DBS certificate
    - Their original photo ID

On arrival, they should:

- Introduce themselves to the office staff and ask for the designated SCR officer
- Their DBS and ID will be checked against the information previously submitted

3. Documents Required Before Starting the Club or Contract

Before your club or contract begins, and whenever it is renewed or amended, you must provide the Academy School with the following:

- A completed and signed Vetting Form A *or* a Letter of Assurance for each member of staff attending the school
- Verification of company identity on arrival (e.g. company badge)
- A copy of your current Public Liability Insurance (if applicable)
- Relevant qualifications (if applicable)
- Current First Aid qualification (if applicable)
- Current Safeguarding training (if applicable)
- Provide up-to-date copies of your company or club's relevant policies and documents (if applicable):

- Safeguarding and Child Protection Policy
- Health and Safety Policy
- Lone Working Policy
- Risk Assessments
- First Aid Procedures
- Complaints Procedure
- Behaviour Policy

4. Academy School Policies to Be Read Before First Visit

All staff who attend the Academy School site must read and understand the following school policies before their first visit. These are available on the website:

- Oaklands Primary Academy

Required Reading:

- Keeping Children Safe in Education KCSIE Part 1
- DfE's safeguarding guidance for providers DfE After-school clubs, community activities, and tuition
- Child Protection & Safeguarding Policy
- Data Security, E-Safety Policy and Acceptable Use Agreement
- GDPR
- Privacy Notices
- Health & Safety Policy
- Fire Management Policy
- Behaviour Policy
- Lettings Policy

All staff must wear their Academy School ID badge at all times. Failure to adhere to these safeguarding procedures may result in the cancellation of your club or contract.

Appendix 8: Concern Received Date Grid

Staff and DSL's may wish to use this checklist to track and monitor concerns raised about a child.

Concern Received
Date Check List

Date

Write the year here	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
January																															
February																															
March																															
April																															
May																															
June																															
July																															
August																															
September																															
October																															
November																															
December																															

Year:

Name:

Put a tick in the relevant box for each concern form received.
This helps Designated Staff identify patterns of concern.

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Appendix 9: Child Protection Procedures Physical Injury to Children

Checklist for Recording:

The NSPCC states that particular attention should be paid to bruises that have petechiae (dots of blood under the skin) around them, which are found more commonly in children who have been abused than in those injured accidentally. Clusters of bruises are also a common feature in abused children. These are often on the upper arm, outside of the thigh or on the body. Refer to the NSPCC website for further guidance.

When you notice an injury to a child that needs to be recorded, try to record the following information in respect of each mark.

- Exact position of injury on the body, e.g. upper outer arm/left cheek
- Size of injury - in approximate centimetres or inches (or use indicators e.g., size of one pence coin, etc.)
- Approximate shape of injury, e.g. round/square or straight line
- Colour of injury - if more than one colour, say so
- Is the skin broken?
- Is there any swelling at the site of the injury, or elsewhere?
- Is there a scab/any blistering/any bleeding?
- Is the injury clean or is there grit/fluff, etc.?
- Is mobility restricted as a result of the injury?
- Does the site of the injury feel hot/does the child feel hot?
- Does the child feel pain?

Staff should not attempt to guess at things beyond their own field of expertise, e.g. age of injury. It is important to remember that you should only record visible injuries. A child's clothing should never be removed for an inspection. There must always 2 members of staff to ensure that the child is never put in an uncompromising position. If the child is injured Children's Social Care will arrange for a Child Protection Medical. When recording injuries, you should never photograph the child.

Also record

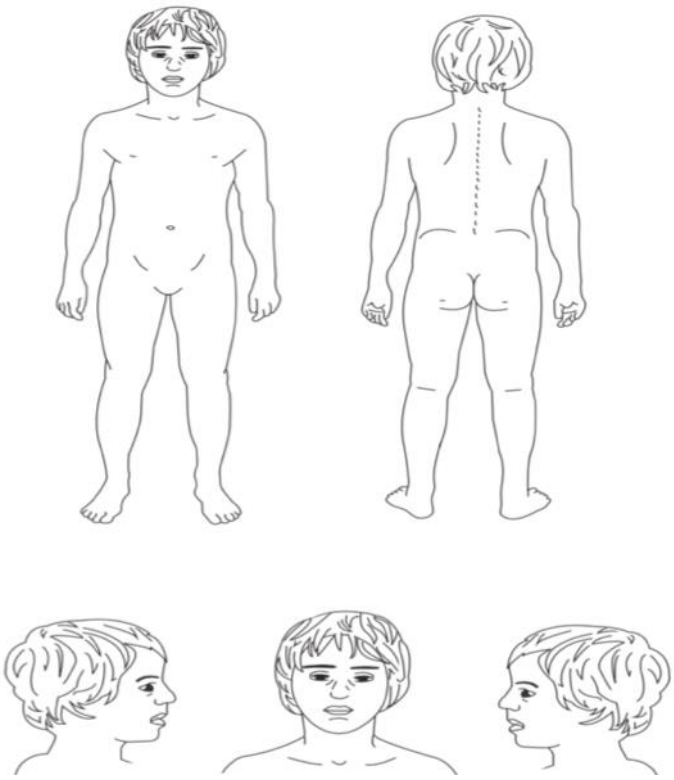
- Explanation for the injury:
  - Child (use child's own words)
  - Adult
- General appearance of the child:
  - Clothing
  - Hygiene
- Child's attitude/demeanour
- Parent's attitude
- Action taken/proposed
  - In your view, does the child need treatment?
- Your name, designation, agency, telephone number
- Date and time of your observation

Appendix 10: Child Protection Body Map

(Please use BLOCK CAPITALS)

It is important to remember that you should only record visible injuries and that there are always 2 members of staff to ensure that the child is never put in an uncompromising position.

Child's Name		Child's D.O.B	../../....
Academy School Name		Class	
Names & position of staff making recording			
Time Recorded		Date Recorded	../../....



Observations			
Staff member making recording to sign:		Date:	../../....
Designated Safeguarding Lead (DSL) to sign:		Date:	../../....

Appendix 11: Information Sources and Key Contacts

1. Internal Policies

All Supporting Policies and Procedures are publicly available on the Academy School's website

- Accessibility Policy
- Allegations of Abuse Against Adults Working Within Our Academy School inc. Low Level Concerns Policy
- Anti-Bullying Policy
- Attendance and First Day Call Policy
- Behaviour Policy
- Data Security & E-Safety Policy and Acceptable Use
- Educational Visits Policy
- Equal Opportunities & Diversity Policy
- First Aid & Medicines Policy
- Health & Safety Policy
- Lettings Policy
- Mobile Device and Smart Technology Policy
- Pupil Mental Health & Well-being Policy
- Relationships & Education Policy
- Special Educational Needs and Disabilities Policy
- Staff Code of Conduct Policy
- Staff Disciplinary Policy
- Volunteer Policy
- Whistle-Blowing Policy for Safeguarding

2. Key Contacts

Bromley Academy Schools

Bromley Education Lead Officer for Education Safeguarding (LADO)
Contact: Gemma Taylor
Address: Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley BR1 1AS
Telephone: 0208 461 7775 / Mobile: 078950 921631
Email: Gemma.Taylor@bromley.gov.uk

Bromley Safeguarding Children Partnership (BSCP)
Address: Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley BR1 1AS
Telephone: 020 8461 7816
Email: BSCB@bromley.gov.uk

Education Safeguarding Officer
Contact: Libby Kember
Address: Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley BR1 1AS
Telephone: 020 8 313 4665 / Mobile 07974 870800
Email: Libby.kember@bromley.gov.uk

Bromley Children's Social Care
Children's Referral & Assessment Team, London Borough of Bromley
Address: Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley BR1 1AS
Telephone: 020 8461 7373/ 7379/ 7026
Out of hours/weekends/public holidays: 0300 303 8671

Email: Multi –Agency Safeguarding Hub (MASH): candfhub@bromley.gov.uk
Secure Email: candfhub@bromley.gcsx.gov.uk
Emergency Duty Team (outside normal working hours) 030 0303 8671 or 999 if a child is in immediate danger.

Mash (Multi Agency Safeguarding Hub) Referrals
For child protection matters requiring discussion or immediate attention:
Telephone: 020 8255 2888 (9am-5pm)
Telephone Out of Hours: 020 8726 6400 (5pm-9am)

All Academy Schools

NSPCC
Telephone: 0808 800 5000
Text: 88858
Email: help@nspcc.org.uk
Or refer to the NSPCC specialised helplines that can provide support for:
- Inquiries into abuse
- Advice about female genital mutilation (FGM)
- Advice about extremism & radicalisation
- Advice about young people affected by gangs
- Advice with concerns that someone may be a victim of modern slavery

Extremism and Radicalisation
In an emergency contact 999
Contact the Anti-Terrorist Hotline: 0800 789 321- anonymously report possible terrorist or extremist activity
Contact the ACT Early Support Line: 0800 011 3764 – share your concerns in confidence with specially trained officers
Bromley Prevent email: prevent@bromley.gov.uk
Making a referral to Prevent: https://www.gov.uk/guidance/making-a-referral-to-prevent
For further information, refer to WWW.GOV.UK website: ***Protecting children from radicalisation: the prevent duty***

Female Genital Mutilation (FGM):
NSPCC FGM Helpline
Telephone: 0800 028 3550
Email: fgmhelp@nspcc.org.uk
Bromley FGM Guidance Document
FGM Resource Pack for Schools

Whistleblowing
- PROTECT - 020 3117 2520
- NSPCC whistleblowing helpline is available for staff that do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

3. Useful Resources

London Safeguarding Children Partnership – London Safeguarding Children Procedures 7th Edition 2022:
https://www.londonsafeguardingchildrenprocedures.co.uk

Keeping children safe in education (DfE): https://www.gov.uk

Working together to safeguard children (DfE) 2023 https://www.gov.uk

Safeguarding Training and Consultancy for Schools/Academies and colleges: https://www.safeguardinginschools.co.uk

The Prevent Duty Guidance: www.gov.uk

FGM Guidance: NSPCC

Sexual Exploitation: NSPCC
Child Exploitation Disruption Toolkit

Bromley Safeguarding Statistics

For latest safeguarding statistics, click on the link below:
Bromley Safeguarding Children Partnership Annual Report

Appendix 12: Information Sharing Duty (September 2026)

Information Sharing Duty - Key Principles

1. Information sharing for safeguarding and promoting welfare is a legal duty.
2. There is no requirement for a safeguarding threshold to be met before sharing.
3. Consent is not required to share safeguarding information where a lawful basis exists.
4. Parents should usually be informed but do not have a right to veto information sharing.
5. Requests from safeguarding partners fall within the statutory duty.
6. Information should be necessary, proportionate, relevant, accurate, timely and secure.
7. Information should only be withheld where sharing would be more detrimental to the child than not sharing.
8. Decisions and rationale must always be recorded.

Monitoring and Implementation Policy

The policy is reviewed annually, although the Trust may vary or amend it periodically to ensure that we fulfil our obligation around the Child Protection and Safeguarding Policy V2. All proposed changes to this policy would be made following the approval from the Committee.

	Name	Date
Policy written by	Headteacher/Principal	September 2026
Review by Committee	Headteacher/Principal	September 2026
Agreed by Committee	CET Board	December 2026
Adopted by Governing Board	Local Governing Board	February 2027
To be reviewed annually		
Review by	September 2027	