Child Protection and Safeguarding Policy
Olive Academies Trust

Document control table	
Title	Child Protection and Safeguarding Policy
Date approved	August 2026
Approved by	OA Board of Trustees
Date of next review	July 2027 (unless legislation updates are required earlier)
Updates/revisions included:	• Updated to reflect **Keeping Children Safe in Education 2026**, effective from 1 September 2026. • Updated to reflect **Working Together to Safeguard Children 2026**, including strengthened multi-agency safeguarding arrangements. • Amended safeguarding responsibilities to reflect the requirement that **all staff read Part One of KCSIE 2026**. • Strengthened references to **Family Help, Early Help and multi-agency working**. • Enhanced guidance relating to **mental health, emotional wellbeing and vulnerability factors**. • Expanded safeguarding content relating to **young carers, children with medical conditions and children experiencing multiple and overlapping harms**. • Updated online safety guidance to reflect emerging risks including **artificial intelligence (AI), deepfake imagery, misinformation, disinformation and harmful online influences**. • Strengthened expectations regarding **filtering and monitoring systems**, including annual review and governance oversight. • Enhanced references to **violence against women and girls (VAWG), misogyny and harmful online ideologies** within safeguarding practice. • Updated statutory references, terminology and safeguarding definitions to ensure compliance for the **2026-2027 academic year**.

This document provides an overview of the safeguarding and child protection policy and procedures for Olive Academies Trust Within each academy; this policy has been localised to ensure that all procedures are in line with local safeguarding guidance and include staff contacts for safeguarding within the academy.

Any general queries about Olive Academies' safeguarding policy and procedures can be directed to our safeguarding lead trustee (Rosemary Leeke) rosemary.leeke@oliveacademies.org.uk or by calling 01708 982624.
In addition to following national statutory and departmental guidance and advice published by the DfE, we also follow local authority's safeguarding procedures.

KEY CONTACTS OLIVE ACADEMIES TRUST

Role	Name	Contact details
Trust Safeguarding Lead	Sarah Coe	Sarah.Coe@oliveacademies.org.uk
Named Safeguarding Trustee on the Trust board	Rosemary Leeke	Rosemary.leeke@oliveacademies.org.uk
Channel Helpline		020 7340 7264 counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321

KEY CONTACTS OA– TUNBRIDGE WELLS

Role	Name	Contact details
Designated Safeguarding Lead	Tony Machin	Tony.machin@oliveacademies.org.uk
Deputy Designated Safeguarding Lead	Natalie Nicholson Eleanor Mather (Charles Street) Mary Carew Lee Palmer	Natalie.Nicholson@oliveacademies.org.uk Eleanor.Mather@oliveacademies.org.uk
Designated Teacher for LAC and PLAC	Mary Carew	Mary.carew@oliveacademies.org.uk
Online Safety Coordinator	Mary Carew	Mary.carew@oliveacademies.org.uk
Safeguarding lead on MAT trustee board	Rosemary Leeke	Rosemary.leeke@oliveacademies.org.uk
Safeguarding link member on AAB	Sophie Dann	Sophie.dann@kent.gov.uk
Chair of Academy Advisory Board (AAB)	Hannah Knowles	Hannah.knowles@oliveacademies.org.uk
Local Authority Designated Officer (LADO)	**LADO Service** - 03000 410888 kentchildrenslado@kent.gov.uk	
Referrals into Early Help and Social Care	**Kent Integrated Children's Services/ Children's Social Work Services** Front Door referral: 03000 411111 Out of Hours Number: 03000 419191	
Channel Helpline	020 7340 7264 counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321	

Contents Page

1. Introduction 4
2. Our ethos and aims 4
3. Legislation and statutory guidance 5
4. Definitions 5
5. Equality statement 6
6. Roles and responsibilities 7
7. Confidentiality and Consent 12
8. Recognising abuse, neglect, exploitation and taking action 14
9. Online safety and the use of personal electronic devices 22
10. Notifying parents or carers 24
11. Students with special educational needs, disabilities or health issues 24
12. Home-educated children 25
13. Looked After Children (LAC) and Previously Looked After Children (PLAC) 25
14. Complaints and concerns about OA safeguarding procedures 26
15. Record keeping 26
16. Training 27
17. Quality Assurance and monitoring of effectiveness 30
18. Links with other policies 30
APPENDIX A - The role of the Designated Safeguarding Lead (and deputy) 31
APPENDIX B - Types of Abuse 33
APPENDIX C - Safer Recruitment 35
APPENDIX D - Managing allegations of abuse made against all staff including supply staff, volunteers and contractors 39
APPENDIX E - Specific safeguarding issues 48
APPENDIX F - Flowchart of safeguarding procedures 53
APPENDIX G - Further Information 54

1. Introduction

Safeguarding is everyone's responsibility. The Trust maintains a culture of vigilance, where staff adopt an 'it could happen here' approach at all times.

Our students' welfare is our paramount concern. The Olive Academies (OA) Board of Trustees and the academy advisory board (AAB) will ensure that we safeguard and promote the welfare of students and work together with other agencies to ensure that we have adequate arrangements to identify, assess and support those students who are suffering or likely to suffer harm.

Our academy is a community and all those directly connected, staff members, trustees and AAB members, parents, families and students, have an essential role to play in making it safe and secure. We wish 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. All our systems, processes and policies should operate in the best interests of the students. Where there is a safeguarding concern, trustees, AAB members and leaders across the trust should ensure that the student's wishes and feelings are considered when determining what action to take and what services to provide. Systems should be in place for students to express their views and give feedback.

As a trust which provides education to students in alternative provision, we recognise that our students often have complex needs and that we remain aware of the additional risk of harm that our students may be vulnerable to. We must take this into account in all our work.

Within this document, the term 'staff' should be broadly read as any adult working within the school or trust, whether directly employed, providing a contracted service, a one-off service such as a supply teacher or a volunteer.

2. Our ethos and aims

We believe that our academy should provide a caring, positive, safe and stimulating environment that promotes the welfare, social, physical and moral development of the individual student.

We recognise:

- the importance of providing an environment within our academy that will help children feel safe and respected
- the importance of enabling children to talk openly and to feel confident that they will be listened to and
- that all adults within the academy, including permanent and temporary staff, volunteers and AAB members, have a full and active part to play in protecting our students from harm.

We will work with parents and carers to build an understanding of the academy's responsibilities to ensure the welfare of all students, including the need for referrals to other agencies in some situations.

At Olive Academies we aim to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote children's welfare
- all staff are aware of their statutory responsibilities with respect to safeguarding and
- staff are properly trained in recognising and reporting safeguarding issues.

3. Legislation and statutory guidance

DfE (2026) 'Keeping children safe in education 2026'
DfE (2026 'Working Together to Safeguard Children 2026'
Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
DfE (2018) 'Disqualification under the Childcare Act 2006'
DfE (2025) 'Academy trust handbook 2026'
HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
HM Government (2025) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
DfE (2024) 'Working together to improve school attendance'

Non-statutory guidance
DfE (2015) 'What to do if you're worried a child is being abused'
DfE (2024) 'Information sharing'
DfE (2026) 'Academy trust governance guide'
DfE (2017) 'Child sexual exploitation'
DfE (2024) 'Recruit teachers from overseas'
DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
DfE (2021) 'Teachers' Standards'
DfE (2025) 'Meeting digital and technology standards in schools and colleges'
DfE (2025) 'Filtering and monitoring standards for schools and colleges'
Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'

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

This policy and the accompanying procedure have been developed in accordance with statutory guidance and local safeguarding procedures in each local authority where our academies are based and working with the three safeguarding partners.

OA also follows: 'Guidance for safer working practice for those working with children and young people in education settings': https://saferrecruitmentconsortium.org/

4. Definitions

Safeguarding concerns may involve multiple and overlapping harms occurring simultaneously. Harm experienced online and offline is often interconnected and safeguarding responses should take account of the child's whole lived experience.

Safeguarding and promoting the welfare of children means:

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

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix B explains the different types of abuse.

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

Sharing of nudes and semi-nudes' images/videos also includes 'pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video' (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children include everyone under the age of 18.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the student involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

5. Equality statement

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

We give special consideration to children who:

- have special educational needs (SEN) or disabilities or health conditions
- are young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are missing from education
- and whose parent/carer has expressed an intention to remove them from school to be home educated.

The Trust is committed to anti-discriminatory and anti-racist practice. Staff will be alert to the impact that racism, discrimination, bias, prejudice and marginalisation may have on children and families. Staff will actively challenge discriminatory language, attitudes and behaviours and ensure that safeguarding decisions are fair, equitable and responsive to children's individual needs and lived experiences.

6. Roles and responsibilities

Safeguarding children is **everyone's** responsibility. Everyone who encounters children and families has a role to play. This policy applies to all staff, volunteers and governance volunteers in the academy and across the trust and is consistent with the procedures of the three safeguarding partners within each local authority region. Our policy and procedures also apply to extended school and off-site activities.

Academies play a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/ misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- behaviour policy
- pastoral support system
- planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - healthy, respectful and equal relationships
    - boundaries, consent and assertive communication
      stereotyping, prejudice, discrimination and equality
    - body confidence, self-esteem and emotional wellbeing
    - recognising unhealthy, abusive, coercive and controlling behaviours
    - the concepts of, and laws relating to, consent, exploitation, abuse, grooming, harassment, rape, domestic abuse, so-called honour-based violence, forced marriage and FGM, and how to access support
    - what constitutes sexual harassment and sexual violence, including online forms, and why they are always unacceptable
    - online harms, including harmful sexual content, pornography, image-sharing abuse, digital exploitation and misogynistic influences

6.1 All staff

All staff, including those who do not work directly with children, will:

- read and understand Part One of Keeping Children Safe in Education 2026.
- read safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- sign a declaration, via Usecure at the beginning of each academic year to say that they have read and understood 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 will be interacting with online)

- and provide a safe space for students 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, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the online safety policy, as well as the safeguarding response to children who go missing from education
- the early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- what to do if they identify a safeguarding issue or a student 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 student-on-student abuse, student sexual exploitation (CSE), student criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalization 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
- 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 Family Help arrangements described within Working Together to Safeguard Children 2026
- how early identification and intervention can prevent concerns from escalating
- the vulnerabilities of young carers
- the additional safeguarding vulnerabilities associated with medical conditions

Staff will ensure that victims are:

- believed
- supported
- never made to feel they are to blame

Section 16 and Appendix D of this policy outline in more detail how staff are trained and supported to do this.

6.2 The designated safeguarding lead (DSL)

Details of our DSL and Deputy DSL are provided at the beginning of this policy - photos and contacts details are clearly displayed in our safeguarding posters in the academy. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours they can be contacted using the email address indicated on the front of the policy. When the DSL is absent, the deputy DSL will act as cover. If the DSLs are not available, the Trust Safeguarding Lead will act as cover (for example, during out-of-hours/out-of-term activities): contact details are at beginning of this policy.

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

- Provide advice and support to other staff on student welfare and student protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour.

Ensure that safeguarding practice is informed by a contextual safeguarding approach, including risks outside the home and online.

The DSL will also:

- Liaise with local authority case managers and designated officers for student protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- Take lead responsibility for safeguarding and student protection, including online safety and understanding the filtering and monitoring systems and processes in place.

The full responsibilities of the DSL and DDSLs are set out in their job description available in Appendix A.

6.3 The Strategic Leadership Group of the trust is responsible for leading a proactive safeguarding culture across the trust and its academies, ensuring that policy and practice is consistent and that there is an annual programme of safeguarding review and audit which leads to improvements in our safeguarding support for our school community.

6.4 The AAB is collectively responsible for advising on safeguarding and checking that safeguarding arrangements are fully embedded within the academy's ethos and reflected in the academy's day-to-day practice. The AAB also appoint a lead member who is responsible for championing good practice within the academy.

6.5 The OA Board of Trustees is ultimately accountable for ensuring the safety of the children at the academy. They will:

- Ensure each school within the trust takes overall strategic responsibility for filtering and monitoring and seek assurance that the filtering and monitoring standards for schools are being met
- Ensure that a safeguarding trustee is nominated to liaise with the school's LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another AAB member or Trustee.
- Ensure each academy within the trust has appropriate arrangements are in place to keep children safe where academy facilities or premises are hired or rented out to organisations or individuals and, where services or activities are provided separately by another body, seek

assurance that the body has appropriate safeguarding and child protection policies and procedures in place and that individuals working with children have appropriate DBS checks. Ensuring each academy within the trust has safeguarding requirements that are included in any transfer of control agreement, i.e. lease or hire agreement, as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement
- Ensure each school within the trust has robust health and safety and emergency evacuation procedures
- Evaluate and approve this policy at each review, ensuring it complies with the law, and holding the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a trustee to monitor this policy's effectiveness with the board of trustees.

The board of trustees will ensure that:
- filtering and monitoring systems are reviewed at least annually
- there is a named senior leader responsible for filtering and monitoring
- staff understand how to escalate safeguarding concerns identified through monitoring systems

The EPS committee is responsible for:
- Any responsibilities delegated to it by the board of trustees.
- Investigating any activity within its terms of reference.

The designated safeguarding trustee is responsible for:
- Liaising with the board of trustees on an agreed basis with regards to safeguarding matters.
- Undertaking any responsibilities delegated to them by the board of trustees.
- Liaising with the DSL in each school on an agreed basis regarding safeguarding matters.
- Taking leadership responsibility for safeguarding arrangements within the trust.
- Ensuring that accurate and effective recordkeeping of concerns and incidents is in place.
- Facilitating a whole-school and trust approach to safeguarding, ensuring that safeguarding and student protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensuring the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- That online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The trust has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix D of this policy covers this procedure
- That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and student protection policies/procedures in place, and inspect them if needed

- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Further information can be found in the guidance Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings

The lead trustee for safeguarding will act as the 'case manager' if an allegation of abuse is made against a member of the SLG within the trust, where appropriate (see Appendix D).

All trustees and AAB members will read Keeping Children Safe in Education in its entirety.

Section 16 of this policy has information on how governance volunteers are supported to fulfil their role.

6.6 The academy has a Designated Teacher who is appropriately trained and is responsible for promoting the educational achievement of children who are looked after. They will work closely with the DSL to address any specific safeguarding concerns and with the Virtual school head to agree how available funding can be best used to support the progress of looked after children and meet the needs identified in the student's personal education plan.

6.7 The case manager for dealing with allegations of abuse made against academy staff members is the head of academy. The case manager for dealing with allegations against the head of academy is the executive headteacher, CEO or Interim Director of Standards who will also report to the safeguarding trustee. The AAB safeguarding lead will also be informed as appropriate. The procedure for managing allegations is detailed in Appendix D.

6.8 The head of academy is responsible for the implementation of this policy within their academy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
  - Promote filtering and monitoring of online systems and procedures
- Communicating this policy to parents/carers when their student joins the school and via the school website
- Ensuring 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 student 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 (see Appendix D)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL and OA central on this

6.9 All staff members, AAB members, volunteers and external providers should know how to recognise signs and symptoms of abuse, how to respond to students who disclose abuse and what to do if they are concerned about a student.

Staff must act in accordance with the staff code of conduct at all times.

6.10 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of students with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

7. Confidentiality and Consent

We recognise that all matters relating to student protection are confidential. It is also essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

The **headteacher or the DSL** will disclose any information about a student to other members of staff on a need-to-know basis, and in the best interests of the student. All staff members must be aware that they cannot promise a student to keep secrets which might compromise the student's safety or well-being.

All staff members have a professional responsibility to share information with other agencies to safeguard children in line with the procedures set out by the three safeguarding partners.

All our staff members who meet children will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.

We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

The key points of **confidentiality** are summarised below:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a student at risk
- Staff should never promise a student that they will not tell anyone about a report of abuse, as this may not be in the student's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There are no easy or definitive answers when a victim makes this request and staff taking a report should never promise confidentiality. Even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)

- The basic safeguarding principle is: if a student is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, **all staff** will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information and will support staff who must make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in Appendix D.

The **following principles** guide our practice on consent and information sharing - we will **proactively seek out** information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support our students.

The academy may have to **share information** about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of student abuse carried out by Children's Social Care.

The **Data Protection Act 2018 is not a barrier** to sharing information. It is there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.

We should be **sharing any concerns we have with parents at an early stage**, unless this would put a student at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.

Be **clear about the purpose** of sharing confidential information and only share as much as you need to achieve your purpose.

Try to **get consent** from parents (or the student, if they have sufficient understanding[1]) to share information, if possible. However, you do not need consent if you have serious concerns about a student's safety and well-being. If you decide to share information without consent, you should record this with a full explanation of your decision.

Consent should not be sought from parents or carers (or the student, if they have sufficient understanding**),** if:

- it would place a student at increased risk of harm; or
- it would place an adult at risk of serious harm; or
- it would prejudice a criminal investigation; or
- it would lead to unjustified delay in making enquiries about allegations of significant harm to a student; or
- required by law or a court order to share information.

Consent is not necessary in cases where Children's Social Care are making student protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Care; staff members must make sure to record what information has been shared.

Consent is necessary for:

- Children's Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in Children's Social Care.
- early help assessments. Assessments are undertaken with the agreement of the student and their parents or carers.

If you are in any doubt about the need for seeking consent, get advice from the DSL or from Children's Social Care.

Keep a record of your decision to share information, with or without consent, and the reasons for it. Remember also that it is just as important to keep a record of why you decided not to share information as why you did so.

8. Recognising abuse, neglect, exploitation and taking action

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

All staff working within the trust will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. The school will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

The academy recognises that poor attendance and children missing education can be indicators of safeguarding concerns and will respond in line with statutory attendance guidance.

8.1 If a student is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a student is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

Referral procedures are provided in Appendix F – flow chart for raising concerns about a student.

If you have any doubt about how to report abuse to the local authority, you can use this link to get contact details: https://www.gov.uk/report-student-abuse-to-local-council

8.2 If a student makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the student they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the student's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a student.

8.3 If you discover that FGM has taken place, or a student is at risk of FGM

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

FGM is illegal in the UK and a form of student abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix E of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately **report this to the police**, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students. **Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

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

Appendix F illustrates the procedure to follow if you have any concerns about a student's welfare. Where possible, speak to the DSL first to agree a course of action.

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

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

Early help
Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our academy or other services such as the NHS. Providing help early is more effective in promoting the welfare of students than reacting later. If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our academy will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard Children* and local guidance, to any student who needs it.

We will pool our knowledge within the academy and with other agencies about which families or students need additional support in a range of ways so that we can work out how best to help them. We will use the early help framework within Children's Social Care to identify what level of need the student or their family has.

We will share information appropriately and work collaboratively with children, families and partner agencies to identify strengths, needs and risks at the earliest opportunity, ensuring that support is child-centred, coordinated and responsive to the family's circumstances.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral
If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral

must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the student's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the student's situation improves.

8.5 If you have concerns about extremism
If a student is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as 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 becoming involved with terrorism, or the local authority children's social care team.

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

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

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

8.6 If you have a mental health concern
All staff should be aware that mental health concerns, emotional wellbeing difficulties, self-harm, suicidal ideation, trauma, anxiety and behavioural difficulties may be indicators that a child has experienced or is at risk of abuse, neglect or exploitation. Equally, adverse experiences, abuse and neglect can have a significant impact on children's mental health, behaviour, attendance and ability to learn.

If you have a mental health concern about a student that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. Please also read the trust's mental health statement which outlines the support available for children and staff across the trust.

The Department for Education provides guidance on mental health and behaviour in schools and each academy provides training and support to staff in supporting students with mental health concerns.

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

The headteacher or senior leader as outline above will then follow the procedures set out in Appendix D, if appropriate.

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

8.8 Child-on-child abuse

The trust is aware that some children may be particularly vulnerable and have an increased risk of abuse. Each school within the trust will recognise that children with SEND or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will consider extra pastoral support for those children.

The trust understands that all pupils have the right to be safeguarded from harm regardless of race, religion, ethnicity, age, gender, sexuality or disability and will ensure that all schools within the trust give special consideration to, amongst others, children who:

- Have SEND
- Are vulnerable to being bullied
- Are looked after or living in unsupportive home situations

DSLs working in schools within the trust will ensure they appropriately assess all instances of child-on-child abuse, including in cases of image-based abuse, to help determine whether the alleged perpetrator(s) is under the age of 18 or is an adult posing as a child. The DSL will immediately refer the case if it is found that a so-called child-on-child abuse incident involves an adult, e.g. where an adult poses as a child online to groom a child or young person.

All staff will be clear as to the trust's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The trust's procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. **All staff** will follow these procedures, as well as the procedures outlined in the trust's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. The trust has a zero-tolerance approach.

We also recognise the gendered nature of student-on-student abuse. However, all student-on-student abuse is unacceptable and will be taken seriously. Most cases of students hurting other students will be dealt with under our academy's behaviour policy, but this student protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the academy at risk
- Is violent
- Involves students being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix E for more information about student-on-student abuse.

Procedures for dealing with allegations of student-on-student abuse
If a student makes an allegation of abuse against another student:

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

Creating a supportive environment in the academy and minimising the risk of student-on-student abuse
We recognise the importance of taking proactive action to minimise the risk of student-on-student abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate students about appropriate behaviour and consent
- Ensure students can easily and confidently report abuse using our reporting systems)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of student-on-student abuse, and know how to identify it and respond to reports
    - That even if there are no reports of student-on-student abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a student's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A student's behaviour might indicate that something is wrong

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a student harming a peer could be a sign that the student is being abused themselves, and that this would fall under the scope of this policy
- The important role they must play in preventing student-on-student abuse and responding where they believe a student may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

8.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

- Whether there is an immediate risk to student(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the students involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

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

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

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

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the students involved (if appropriate). If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through calling the academy's link police officer and completion of a MASH referral using the Multi Agency Framework (MAF) as appropriated.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and online safety programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is

- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

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

8.10 Reporting systems for our students

Where there is a safeguarding concern, we will take the student's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for students to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for students – through posters, discussions with students and website information
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Use our annual audit cycle to check with students about their confidence and knowledge about the reporting systems

9. Online safety and the use of personal electronic devices

The Trust recognises that online safety includes risks associated with:

- misinformation and disinformation
- conspiracy theories
- harmful online content and influence
- the use of generative AI tools

The Trust will ensure that filtering and monitoring systems are effective, regularly reviewed and appropriate to the level of risk, in line with DfE filtering and monitoring standards.

The Trust recognises the importance of safeguarding children from potentially harmful and inappropriate online material and understand that technology is a significant component in many safeguarding and wellbeing issues. All academies will adhere to the ICT and Online Safety Policy.

Through training, all staff within the trust will be made aware of the need to:

- Ensure an appropriate level of security protection procedures to safeguard systems, staff and students – these are reviewed to keep up with evolving cyber-crime technologies – these procedures are outlined in our ICT and online safety policy

- 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

AI-generated content may also present safeguarding risks including deepfake imagery, manipulated or synthetic sexual imagery, image-based abuse, online grooming and misinformation. Staff will be alert to the safeguarding implications of emerging technologies and their potential misuse

The four key categories of risk

All staff training on online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, misinformation, disinformation, conspiracy theories, deepfake content, racism, misogyny, self-harm, suicide, anti-Semitism, 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 students 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 students 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' meetings. 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 students are not present
  - will not take pictures or recordings of students on their personal phones or cameras
- Make all students, parents/carers, staff, volunteers and trustees/AAB members aware that they are expected to sign an agreement regarding the acceptable use of the internet in the academy, use of the academy's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' 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 academy's IT systems, in accordance with the filtering and monitoring standards published by the DfE.
- Limit students' exposure to the above risks from the academy's IT system. Systems are regularly reviewed, and DSLs know how to escalate concerns when identified.
- 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

10. Notifying parents or carers

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other student involved, and when. We will work with the police and/or local authority for children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what is being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what is being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

11. Students with special educational needs, disabilities or health issues

We recognise that students 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:

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

To address these additional challenges our academy will ensure that these children receive additional monitoring and pastoral support. This includes individual risk assessment and safety plans being put in place for each student, support with acquiring and maintaining EHCPs, 1:1 coaching and mentoring, provision of counselling as needed and multi-agency support as considered appropriate.
Any abuse involving students with SEND will require close liaison with the DSL (or deputy) and the SENCO. The Trust also recognises that children with medical conditions may face additional safeguarding challenges and barriers to disclosure. Staff should consider whether medical conditions may increase a child's vulnerability, dependence on adults or ability to communicate concerns.

11.1 Young Carers

The Trust recognises that young carers may experience additional safeguarding and welfare vulnerabilities.

Young carers may experience:

- poor attendance or punctuality
- emotional wellbeing concerns
- social isolation
- anxiety and stress
- reduced opportunities to participate in education and enrichment activities

Staff should be alert to indicators that a child may have caring responsibilities and should discuss concerns with the DSL. Where appropriate, referrals will be made to young carers' services and additional support will be provided.

12. Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them. In line with the School Attendance (Pupil Registration) (England) Regulations 2024, each school within the trust will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll. Where a parent has expressed their intention to remove a pupil from a school within the trust for EHE, the school, in collaboration with the trust, LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Students with a social worker

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

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

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

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

13. Looked After Children (LAC) and Previously Looked After Children (PLAC)

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

- Appropriate staff have relevant information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

Our **Designated Teacher** is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Recognise the non-statutory role of Virtual School Heads in promoting the educational outcomes of children with a social worker and children in kinship care and work collaboratively with Virtual School Heads where appropriate.

14. Complaints and concerns about OA safeguarding procedures

14.1 Complaints against staff

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

14.2 Other complaints

We recognise that children cannot be expected to raise concerns in an environment where staff member fail to do so.

We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice.

We will actively seek the views of children, parents and carers and staff members on our student protection arrangements through surveys, questionnaires and other means.

Further information and support for staff is available in Appendix D on managing allegations, our code of conduct, and our whistleblowing policy.

14.3 Whistleblowing

Our whistleblowing policy provides details of how concerns can be raised about the trust's safeguarding practice – it is available on our academy and trust websites.

15. Record keeping

Accurate and timely record keeping is an important part of the academy's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children. We will hold records in line with our records retention schedule.

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

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate student protection file for each student.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

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

If a student for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their student protection file is forwarded as soon as possible, securely, and separately from the main student file. To allow the new school/college to have support in place when the student arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the student.

All academies use CPOMs for the secure storage and sharing of information related to safeguarding. If staff do not feel confident in the use of CPOMS they should ask for further training from the DSL.

All staff members, trustees and AAB members, volunteers, contractors and activity providers should ensure that they record and report safeguarding concerns in line with guidance from the local multiagency procedures.

The DSL will ensure that records (be they on CPOMS or in paper format) are maintained appropriately and securely for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

In addition:

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

16. Training

16.1 All staff

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

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the three safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all students

All new members of staff, including **early career teachers** and **teaching assistants**, will be given an induction which includes reference to:

- the safeguarding and child protection policy
- the behaviour policy
- staff code of conduct
- the policy/guidance which includes the safeguarding response to children who go missing from education
- the role of the DSL and share the identities of the DSL and all DDSLs
- Keeping Children Safe in Education

All new members of staff are expected to read the above-mentioned documents and to sign an acknowledgement of this.

They will be given full child protection and safeguarding training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to cybersecurity, filtering and monitoring.)

The induction and CPD Programme for Staff will include but is not limited to

Understanding Safeguarding Concerns: Differentiate between a safeguarding concern and a student in immediate danger or at risk of significant harm.

Adopting a Vigilant Attitude: Maintain an attitude of 'it could happen here' regarding safeguarding.

Responding to Welfare Concerns: Know what to do when concerned about a student's welfare, always acting in the student's best interests.

Recognising Behavioural Signs: Understand that poor behaviour may indicate a child is suffering harm or has been traumatised by abuse.

Supporting Children with Social Workers: Recognise that children with social workers may face educational disadvantages and barriers to attendance, learning, behaviour, and mental health.

Monitoring Attendance: Be aware that prolonged or repeated absences can signal safeguarding issues, including neglect, sexual exploitation, and criminal exploitation (e.g., county lines).

Addressing Mental Health Issues: Recognise that mental health issues may indicate harm or abuse, and that known harm or abuse can impact a student's mental health, behaviour, and education.

Considering Extrafamilial Harms: Understand that safeguarding incidents can occur outside school and between children outside these environments. Consider risks of abuse or exploitation in situations outside the family, including sexual exploitation, criminal exploitation, and serious youth violence.

Responding to Disclosures: Learn how to respond appropriately to a student who discloses abuse or harm.

Seeking Guidance: Always speak to the DSL or deputy DSL if unsure about any concerns.

Immediate Action on Concerns: Act immediately on any concerns about a student's welfare. Do not assume another professional will take action.

Availability of DSL: Ensure the DSL or a deputy is always available to discuss safeguarding concerns. If unavailable, speak to a senior leadership team member or take advice from the LADO. Share any actions taken with the DSL or deputy as soon as possible.

Prevent Training: Receive training on the government's anti-radicalisation strategy, Prevent, to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will receive regular safeguarding and child protection updates, including on online safety and cyber-security, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Staff members who miss whole-academy training will be required to undertake other relevant training to make up for it, e.g. by joining another academy's whole-academy training or having a 1:1 session. The DSL will be responsible for arranging this.
Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

The training programme will also include:

- anti-racist safeguarding practice
- unconscious bias and professional curiosity
- safeguarding children experiencing multiple and overlapping harms
- young carers
- online harms arising from artificial intelligence and deepfake technology
- violence against women and girls (VAWG)
- misogyny and harmful online ideologies

The academy will maintain accurate records of staff induction and training.

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

16.3 Trustees and AAB members
All trustees and AAB members receive training about safeguarding and student protection (including online safety and cyber security) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the safeguarding trustee lead may be required to act as the 'case manager' if an allegation of abuse is made against a member of SLG, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels
At least one person conducting any interview for any post at the trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. See Appendix C of this policy and our safer recruitment statement for more information about our safer recruitment procedures.

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

17. Quality Assurance and monitoring of effectiveness

The trust will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of child protection files and records by the DSL

The trust will complete an annual programme of audits and reviews. This includes an internal audit visit from the trust lead for safeguarding, a review from the lead trustee for safeguarding and the link AAB member, and an externally commissioned audit. We will also participate in any reviews requested by the Local Safeguarding Children Partnership or Local Authority. Additionally, we will carry out regular internal audits.

The board of trustees will receive regular safeguarding reports and provide strategic challenge to ensure compliance with statutory duties.

Any concerns regarding the safeguarding practices at the trust will be raised with the academy leadership group of the school, and the necessary whistleblowing procedures will be followed, as outlined in the trust's Whistleblowing Policy. If a staff member feels unable to raise an issue with their school's SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285 The school/academy's senior leadership group and the trust board will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements.

This policy will be reviewed **annually** by the trust safeguarding lead. At every review, it will be approved by the Board of Trustees.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour Policy
- Anti-bullying Policy
- Staff code of conduct (with staff handbook)
- Complaints Policy
- Searching, screening and confiscation policy
- Positive handling and de-escalation
- First Aid and Administration of medicines
- Health and safety
- Attendance including Children missing education
- ICT and Online safety
- Social media
- Equality Diversity and Inclusion policy
- Relationships and sex education
- PSHE
- Mental health Policy
- Privacy notices
- Whistleblowing

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

APPENDIX A - The role of the Designated Safeguarding Lead (and deputy)

1. Managing Referrals

- Refer all cases of suspected abuse to local authority Children's Social Care and to the Police if a crime may have been committed.
- Liaise with the headteacher about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Act as a source of support, advice and expertise to staff members on matters of student protection and safeguarding.
- Liaise with agencies providing early help services and coordinate referrals from the academy to targeted early help services for children in need of support.
- Monitor any cases referred to early help and consider referral to children's services where the situation does not improve.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Take lead responsibility for safeguarding and student protection, including online safety and understanding the filtering and monitoring systems and processes in place.

2. Working with others

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the three safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for student protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety):
    - when deciding whether to make a referral by liaising with relevant agencies and so that children's needs are considered holistically
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Promote educational outcomes by knowing the welfare, safeguarding and student protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children's attendance, engagement and achievement at school. Working with the headteacher and other staff, the designated safeguarding lead should take lead responsibility for:
    - ensuring that the school or college knows who its cohort of children who currently need a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
    - support teaching staff to feel confident to provide additional academic support or reasonable adjustments to help children who need or have needed a social worker reach their potential,

recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

3. Information sharing and managing the child protection file

The DSL is responsible for ensuring that child protection files are kept up to date and stored securely. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

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

4. Awareness Raising

- Review the safeguarding and child protection policy and procedures annually in partnership with OA central who will recommend the policy to OA trustees for approval.
- Make the safeguarding and child protection policy and procedures available publicly and raise awareness of parents that referrals about suspected abuse may be made and the role of the academy in any investigations that ensue.
- Provide updates to the academy on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews, at least annually.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. This could include ensuring that staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

5 Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

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

APPENDIX B - Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

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

- Conveying to a student that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the student opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a student's developmental capability, as well as overprotection and

limitation of exploration and learning, or preventing the student participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a student or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a student in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.
Once a student is born, neglect may involve a parent or carer failing to:

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

APPENDIX C - Safer Recruitment

(Links with the Safer Recruitment and Policy that can be found in the policies folder on the shared drive)

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. Our recruitment procedures and safer recruitment statement provide more detail about actions we take to ensure we recruit suitable people.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our trust's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms
Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- Require personal details, current and former names, current address and national insurance number
- details of their present (or last) employment and reason for leaving
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- Qualifications, the awarding body and date of award
- Details of referees/references and
- A statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.
- Olive Academies will only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

Shortlisting
Our shortlisting process will aim to include three people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so they can share relevant information and discuss it at the interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true and that they will inform us should there be any subsequent change to the information.

We may also carry out an online search for shortlisted candidates to help identify any incidents or issues that are publicly available online. This will be completed by someone with no other involvement in the recruitment process. If this is to occur, OA will inform shortlisted candidates that online searches may be done as part of due diligence checks.

Seeking references and checking employment history
We will make every effort to obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.
When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees

- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Take copies of Qualifications, the awarding body and date of award, as appropriate to the person specification. Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the academy's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, the appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could, where available, include:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter confirming they have not imposed any sanctions or restrictions, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* *Management positions are most likely to include, but are not limited to, Head of Academies, deputy/assistant headteachers.*

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a student or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a student or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left
- Ensure that, where the school ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers
Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain letters of assurance from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers
We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Members, Trustees and AAB members
All members, trustees and AAB members will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of trustees will undertake a suitability check by the DfE and an enhanced DBS check that will be conducted regardless of checks previously performed by other organisations or how recently these took place

All proprietors, members, trustees, and AAB members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008) - excluding AAB members
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings
Where we place a student with an alternative provision provider, we obtain letters of assurance from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise students on work experience
When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.
We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Single Central Record
Each Academy Office Manager and the HR Manager carry out the *operational task* of physically checking the SCR and making sure all the relevant employment checks are complete and that the document is up to date.

The Trust Safeguarding Lead and HR Manager will provide quality assurance, support and guidance on the SCR to ensure all aspects are complete.

SLG are responsible for ensuring that Mangers are keeping up with their statutory duties.
The safeguarding trustee ensures that the SCR is monitored by asking the right questions about how complete the record is, how frequently it is reviewed and how it is stored.

Appendix D - Managing allegations of abuse made against all staff including supply staff, volunteers and contractors

Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our academy. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. Our general principles are outlined below and are based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education':

OA has in place a central HR manager who will provide support and advice to academy staff should there be an allegation against an adult.

Section 1: allegations that may meet the harms threshold

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

- Behaved in a way that has harmed a student, or may have harmed a student, and/or
- Possibly committed a criminal offence against or related to a student, and/or
- Behaved towards a student or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
- If there is any doubt as to whether a concern meets the harm threshold, the trust will consult the local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the head of academy, the executive headteacher, Interim Director of Standards or CEO where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

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

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

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

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

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

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

False: there is sufficient evidence to disprove the allegation

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

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.

- Discuss the allegation with the designated officer at the local authority. It is important to ensure that local documentation is completed to the LADO this could include a LADO referral form and MAF. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the academy and their contact details.

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate:

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

If the academy is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency. Where the police are involved, wherever possible the academy will ask the police at the start of the investigation to obtain consent from the individuals involved

to share their statements and evidence for use in the trust's disciplinary process, should this be required at a later point.

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

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome OA central HR will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the academy, while the academy carries out the investigation. We will involve the agency fully, but the academy will take the lead in collecting the necessary information and providing it to the LADO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary). When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

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

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

Conclusion of a case where the allegation is substantiated
If the allegation is substantiated and the individual is dismissed or the academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the academy will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension
If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the student or children who made the allegation, if they are still attending the academy.

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

Unsubstantiated, unfounded, false or malicious allegations
If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the student and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate. If shown to be deliberately invented, or malicious, the academy will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing
The academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

Record-keeping
The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

In these cases, the academy will provide a copy to the individual, in agreement with children's social care or the police as appropriate. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Student Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References
When providing employer references, we will not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious. Substantiated allegations will be included provided that the information is factual and does not include opinions.

Managing the situation and exit arrangements
The academy has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a student, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or OA HR. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety and welfare of children, including any in which the person refuses to cooperate with the process.

'Settlement agreements' (sometimes known as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

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

This will include consideration of (as applicable):

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

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

Non-recent allegations
Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a student to the LADO in line with our local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the academy that they were abused as a student, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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

It also applies to organisations or individuals using academy premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, we would follow safeguarding procedures, including informing the LADO.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a student, parent or other adult within or outside the academy
- Pre-employment vetting checks

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

Definition of low-level concerns

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

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a student on a one-to-one basis where they cannot easily be seen
- Humiliating students

Sharing low-level concerns

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any patterns, clusters or concerns in the academy's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will appoint an incident assessor who will collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously and to the individual involved and any witnesses.

The incident assessor will follow the guidance set out in the trust's 'Incident Toolkit' and collate the relevant information using the templates within that tool kit. They will give this to the headteacher who will use the information collected to categorise the type of behaviour and determine any further action, in line with the trust's staff code of conduct and where, relevant in consultation with their line manager.

Further information about responding to low-level concerns is provided in this DfE recommended report: Developing and implementing a low-level concerns policy: A guide for organisations which work with children

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

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

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

The Trust wil ensure that low-level concerns are:
• recorded consistently
• reviewed for patterns and trends
• used to inform safeguarding culture and training

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

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

The flow chart below summarises the procedures to be followed when dealing with an allegation made against an individual who works with children:

Allegations against academy staff: Guidance flow chart

If you become aware that a member of staff may have:

- behaved in a way that may have harmed a child or
- possibly committed a criminal offence against a child or
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

↓

The child and/or alleged abuser SHOULD NOT be questioned but a record made of what has been reported

↓

Report immediately to the headteacher (or the DoA/CEO if the allegations concerns the exec HT/ headteacher) (or in their absence, the DSL) who, unless there is evidence to prove the allegation is incorrect, will:

↓

Report to the LADO (Local Authority Designated Officer for Allegations) - ensure local are safeguarding board procedures are followed

Take advice from Human Resources

↓

The LADO will:

1) Consider the relevant facts and concerns re the adult and child/ren, including any previous history
2) Decide on the next course of action – usually straight away, sometimes after consultation with others such as HR

↓

If DfE procedures are NOT to be followed, the LADO will agree with you an appropriate response (e.g. the school to undertake enquiries)

If the DfE procedures are to be followed, a strategy meeting will normally be held by phone or in person. Normally, the headteacher, the LADO, HR and other police are invited. Information is shared, risks to the children considered and appropriate action agreed – e.g. S47 Children Act enquiries, school enquiries, disciplinary measures (or unusually) criminal proceedings. A record of the meeting will be made, and further meetings held every 4 weeks until a conclusion is agreed

This document is intended for use as a guide. For more detail, please refer to 'Keeping Children safe in education, statutory guidance for schools and colleges'.

Appendix E - Specific safeguarding issues

This appendix is based on the advice in Keeping Children Safe in Education 2026, in particular Annex A:

Further Information, which sets out detailed guidance on a wide range of specific safeguarding issues. All staff must read Annex A in full as part of their safeguarding training and induction.

Annex A includes information on further issues to be aware of, including (but not limited to):

- student abduction and community safety incidents,
- children's involvement in the court system,
- children with family members in prison,
- county lines,
- modern slavery,
- cybercrime,
- online harms,
- AI-generated abuse, and
- contextual safeguarding risks.

Children Missing from Education
A student going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues.

These may include:

- abuse,
- exploitation or neglect,
- sexual abuse,
- child sexual exploitation (CSE),
- child criminal exploitation (CCE),
- mental health difficulties,
- substance misuse,
- radicalisation,
- female genital mutilation (FGM), or
- forced marriage.

Certain groups of children are known to be at greater risk of going missing from education, including those who:

- Are at risk of harm, abuse or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma or Traveller communities
- Are from families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend school unexpectedly
- Are from new migrant families
- Are experiencing significant mental health difficulties
- Are young carers (new emphasis in KCSIE 2026)

We follow our procedures for unauthorised absence and for children missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation or neglect. This includes informing the local authority if a student leaves the school without a new school being named and adhering to statutory

requirements for sharing information with the local authority when removing a student's name from the admissions register at non-standard transition points.

Staff receive training on the signs and triggers associated with children missing from education, including risks linked to travelling to conflict zones, FGM, forced marriage, exploitation, and online radicalisation.

If a staff member suspects that a student is suffering, or is likely to suffer, harm or neglect, we follow local safeguarding procedures and make reasonable enquiries. We make an immediate referral to children's social care—and to the police if the student is in immediate danger.

Child Criminal Exploitation (CCE)
Child criminal exploitation is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a student into criminal activity. This may be in exchange for something the student needs or wants, for the financial or other advantage of the perpetrator, or through violence or threats of violence.

CCE can be perpetrated by males or females, adults or children, and may involve a single incident or a pattern of repeated harm. It can occur in person or online.

CCE may involve, but is not limited to:

- County lines activity
- Drug distribution
- Serious violence
- Financial exploitation (newly emphasised in KCSIE 2026)
- Online coercion or blackmail
- Involvement in organised criminal networks

Students who are being criminally exploited may:

- Go missing from home, care or education
- Have unexplained money, gifts or new possessions
- Be increasingly secretive or withdrawn
- Show signs of assault, injury or fear
- Associate with older individuals or groups
- Display sudden changes in behaviour or mental health
- Be targeted online by adults or peers

Staff must report any concerns immediately to the DSL. We work closely with children's social care, the police and relevant mult-agency partners to safeguard students who may be at risk of criminal exploitation.

Child Sexual Exploitation (CSE)
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 student into sexual activity, in exchange for something the student needs or wants, and/or for the advantage of the perpetrator.

CSE can occur online or in person, and may involve:

- Sexualised conversations or grooming
- Sharing sexual images
- Sexual activity
- Threats, coercion or blackmail
- Exploitation through technology or social media

Indicators of CSE may include:

- Going missing from home or education
- Unexplained gifts or money
- Relationships with older individuals
- Sudden changes in behaviour or appearance
- Secretive online activity
- Signs of trauma, fear or distress

Staff must report concerns immediately to the DSL.

County Lines

County lines is a form of organised criminal exploitation where children are used to move, store or sell drugs, often across different local authority areas. Children may be groomed, threatened or coerced into involvement.

Indicators include:

- Missing episodes
- Travel to unfamiliar areas
- Association with gangs
- Unexplained money or possessions
- Increased fear, anxiety or aggression
- Being found in locations far from home

We work closely with police and safeguarding partners where county lines activity is suspected.

Modern Slavery and Human Trafficking

Modern slavery encompasses human trafficking, forced labour, domestic servitude and criminal exploitation. Children may be trafficked within the UK or internationally.

Indicators include:

- Poor living conditions
- Signs of physical abuse or neglect
- Fearful or withdrawn behaviour
- Limited freedom of movement
- Working long hours or performing inappropriate tasks

Staff must report concerns immediately.

Cybercrime

Cybercrime involves criminal activity using computers or digital devices.

Students may be:

- Hacking
- Using malware
- Participating in online fraud
- Being coerced into criminal online activity

Students with advanced digital skills may be at increased risk of being targeted by criminals online.
Staff should report concerns to the DSL, who will work with police cybercrime teams where appropriate.

Online Harms and AI-Generated Abuse
KCSIE 2026 includes strengthened guidance on online harms, including:

- Online grooming
- Coercion or blackmail
- Sharing nudes and semi-nudes
- Deepfakes and AI-generated sexual imagery
- Nudification apps
- Misogynistic online communities (including incel groups)
- Online radicalisation
- Harmful challenges or trends

Students may be victims or perpetrators. Staff must report concerns immediately.

Harmful Sexual Behaviour (HSB)
HSB includes sexual behaviour between children that is developmentally inappropriate, harmful, abusive or violent. It may occur online or in person.

Indicators include:

- Sexualised language
- Sexualised behaviour towards peers
- Coercion or pressure
- Sharing sexual images
- Sexual harassment

We follow local safeguarding procedures and statutory guidance when responding to HSB.

Domestic Abuse
Children may experience domestic abuse directly or indirectly. Exposure to domestic abuse is always a safeguarding concern.

Indicators include:

- Fearful behaviour
- Aggression or withdrawal
- Poor attendance
- Emotional distress
- Physical injuries

Staff must report concerns immediately.

Children Potentially at Greater Risk of Harm
Certain groups of children may be more vulnerable to safeguarding risks, including:

- Children with SEND
- Children requiring mental health support
- Young carers (new emphasis in 2026)
- Children with medical conditions (new in 2026)
- Children with family members in prison
- Children in alternative provision
- Children in boarding/residential settings
- Children who are LGBT or gender-questioning (new dedicated section in 2026)

Staff must be alert to additional vulnerabilities.

Radicalisation and Extremism
Students may be vulnerable to radicalisation or extremist ideologies, including online communities promoting misogyny, violence or hate.

Indicators include:
- Sudden changes in behaviour
- Isolation or withdrawal
- Use of extremist language
- Accessing extremist content online

We follow Prevent Duty guidance and Channel referral processes.

Forced Marriage and Honour-Based Abuse
Forced marriage is illegal. Honour-based abuse may involve violence, coercion or control.

Indicators include:
- Fear of family expectations
- Sudden restrictions on freedom
- Concerns about travel abroad
- Signs of physical or emotional abuse

Staff must report concerns immediately.

Female Genital Mutilation (FGM)
FGM is illegal and constitutes child abuse. Staff have a mandatory duty to report known cases involving under-18s to the police.

Indicators include:
- Concerns about travel
- Talk of “special procedures”
- Difficulty walking or sitting
- Withdrawal or distress

Staff must follow statutory reporting duties.

Fabricated or Induced Illness
This involves a parent or carer exaggerating or inducing illness in a child. Staff must report concerns immediately.

Private Fostering
A private fostering arrangement occurs when a child under 16 (or under 18 if disabled) is cared for by someone who is not a parent or close relative for 28 days or more. Staff must notify the DSL, who will inform the local authority.

Substance Misuse
Students may misuse drugs, alcohol or other substances. Staff must report concerns immediately.
Bullying, Including Prejudice-Based Bullying
Bullying may be physical, verbal, online or relational. Prejudice-based bullying may relate to protected characteristics. Staff must report concerns immediately.

APPENDIX F - Flowchart of safeguarding procedures

Flow chart for raising safeguarding concerns about a child

Designated Safeguarding Lead:

Tony Machin
tony.machin@oliveacademies.org.uk

Deputy Designated Safeguarding Leads:

Lee Palmer
lee.palmer@oliveacademies.org.uk

Mary Carew
mary.carew@oliveacademies.org.uk

Natalie Nicholson
natalie.nicholson@oliveacademies.org.uk

Eleanor Mather
eleanor.mather@oliveacademies.org.uk

Record a concern about child in writing on CPOMS (alerting Designated Safeguarding Lead)

Safeguarding Trustee:

Rosemary Leeke
rosemary.leeke@oliveacademies.org.uk

The Local Authority Designated Officer and Education Safeguarding Advisory Service can be contacted if you have a concern about or receive an allegation against an adult who works with children.

Online LADO referral form:
https://kccchildrens.kent.gov.uk

Designated Safeguarding Lead reviews concern and makes a decision about next steps

Decision made to monitor the concern

Decision made to discuss the concern informally with the parents/carers

Decision made to refer the concern to social care

MONITOR

DISCUSS

REFER

Class teacher asked to monitor child and feedback to the Designated Safeguarding Lead within an agreed timescale

MONITOR

Once discussed with parents Designated Safeguarding Lead decides to discuss further with parents, monitor or refer to social care

REFER

Designated Safeguarding Lead discusses decision with a senior teacher or the head and agree to refer to social care

RECORD

Designated Safeguarding Lead keeps concern in secure, confidential safeguarding file

In exceptional circumstances, anyone may report concerns or seek advice directly from:

Kent's Front Door Team on 03000 41 11 05 or Frontdoor@kent.gov.uk or www.kelsi.org.uk/

Members of the public can discuss concerns before making a referral by calling the ACT Early Support Line on 0800 011 3764.

NSPCC Whistleblowing Helpline 0800 028 0285

APPENDIX G - FURTHER INFORMATION

For a full list of additional advice and support please refer to KCSIE 2026

All academies have links to local safeguarding information. Please contact the academy DSL for more information on local support.

Sharing nudes and semi-nudes guidance: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
DfE Guidance: Safeguarding practitioners: information sharing advice:
https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice
DfE Statutory guidance: Working together to safeguard children:
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2
DfE Statutory guidance: Keeping children safe in education
www.gov.uk/government/publications/keeping-children-safe-in-education--2
DfE guidance: Sexual violence and sexual harassment between children in schools and colleges:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf
DfE: Advice what to do if you are worried that a child is being abused 2015:
https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2
Guidance on e-security – National Education Network
Cyber security standards for schools and colleges
LGfL online safety policies: lgfl.net
The Prevent duty – guidance for schools and childcare providers:
https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

APPENDIX H - Acronyms

Acronym	Long form	Description
AI	Artificial intelligence	Computer systems and software that are able to perform tasks that ordinarily require human intelligence, such as decision-making and the creation of images.
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act 2018.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
[New] EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.

FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	The UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the UK and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in LA care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.

PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs and disabilities (SEND) policy and provision of education to pupils with SEND.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads oversee promoting the educational achievement of all the children looked after by the LA they work for, and all children who currently have, or previously had, a social worker.