The Highcrest Academy

Our Vision

We work together, in a happy, caring and inclusive community, providing for students of all abilities, backgrounds and cultures, supporting their well-being and developing their characters, giving them every opportunity to aspire and achieve their unique academic and personal ambitions.

Child Protection and Safeguarding Policy 2026-2027

This policy has been re-written in September 2026

Approved by the Full Trust Board **October 2026**

Review Date: **Annually**

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Policy statement

Safeguarding and promoting the welfare of children is everyone's responsibility.

'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Keeping Children Safe in Education.

1. Ethos statement

We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all children. We aim to provide a safe and welcoming environment in which children can learn, underpinned by a culture of openness where both children and adults feel secure, are able to raise concerns and believe they are being listened to, and that appropriate action will be taken to keep them safe.

2. Introduction

The Academy Trust Board recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children and locally agreed inter-agency procedures put in place by Buckinghamshire Safeguarding Children Partnership.

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

Safeguarding and promoting the welfare of children is defined as:

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

This policy is for all staff, parents, governors, volunteers, supply staff and contractors and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school The academy maintains a schedule of linked safeguarding policies and procedures, which are reviewed in line with the Trust policy cycle. In particular, this policy should be read in conjunction with the school's Code of Conduct/Staff Behaviour Policy (including Acceptable Use of ICT), Safer Recruitment Policy, Online Safety Policy, Behaviour and Anti-Bullying Policy, school's guidance on low-level concerns, Child-on-Child Abuse Policy and procedures, and Part Five of KCSiE, copies of which will be provided to all staff on induction.

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people, and ensure that all staff understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The Academy Trust Board expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff working in school must, as a minimum, have read and understand Part One of KCSiE and Part Five: Child-on-child sexual harassment and sexual violence. Governors/the proprietor will ensure that they and senior leaders have read and understand Parts One and Two of KCSiE.

The Academy Trust Board will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated. The Academy Trust Board will ensure that all governors and trustees receive appropriate safeguarding and child protection training (including online) at induction which is regularly updated.

Compliance with the policy will be monitored by the Headteacher, designated safeguarding lead (DSL) and named safeguarding trustee.

3. Statutory framework

As a state-funded academy, The Highcrest Academy is legally an independent school whose proprietor is the Academy Trust. Section 157 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the academy funding agreement require the Trust to safeguard and promote the welfare of pupils and to have regard to statutory guidance issued by the Secretary of State, including Keeping Children Safe in Education.

In accordance with statutory guidance, Working Together to Safeguard Children, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint duty for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements. In Buckinghamshire, all schools have been named by the Buckinghamshire Safeguarding Children's Partnership (BSCP) as relevant agencies, this means staff in schools must work in accordance with the multi-agency procedures developed by the BSCP which can be found on their website at: Home - Buckinghamshire Safeguarding Children Partnership

4. Key roles and responsibilities

Academy Trust Board

The Highcrest Academy is a single-academy trust. The Academy Trust is the proprietor and its Board of Trustees is the academy's accountable governing body. The Board retains ultimate accountability for safeguarding and promoting the welfare of pupils and must ensure compliance with statutory duties

and Keeping Children Safe in Education. A committee or individual trustee may exercise functions formally delegated by the Board, but delegation does not transfer the Board's ultimate accountability.

The Academy Trust Board has a strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The Academy Trust Board has a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote children and young people's welfare. The Academy Trust Board will also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

The Academy Trust Board will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the child at their heart.

The Academy Trust Board will ensure that where there is a safeguarding concern school leaders will make sure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Academy Trust Board will ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children and that the school's safeguarding arrangements take into account the procedures and practice of the locally agreed multi-agency safeguarding arrangements in place.

The Academy Trust Board will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of children and young people as appropriate:

- child-on-child abuse
- online safety,
- behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- special educational needs and disability
- supporting pupils in school with medical conditions
- staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of IT, including the use of mobile devices and communications, including the use of social media.)
- procedure for responding to children who go missing from education, particularly on repeat occasions.
- safer recruitment

Safer recruitment and regulated activity

The academy will apply the definition of regulated activity in force under the Crime and Policing Act 2026. The previous supervision exemption no longer applies to a volunteer who teaches, trains, instructs or supervises children frequently, on more than three days in a 30-day period, or overnight. Where a role is regulated activity, the required enhanced DBS check with children's barred-list information must be obtained. Detailed procedures are contained in the Trust's Safer Recruitment Policy.

It is the responsibility of the Academy Trust Board to ensure that staff and volunteers are properly vetted to make sure they are safe to work with the pupils who attend our school and that the school has procedures for appropriately managing safeguarding allegations made against, or low level concerns involving, members of staff (including the headteacher, supply teachers, contractors, and volunteer helpers).

The Academy Trust Board will ensure that there is a named governor for safeguarding, a Designated Safeguarding Lead (DSL) who is line managed by the Principal, has lead responsibility for safeguarding and child protection, and a designated teacher to promote the educational achievement of children who are looked after, or previously looked after, and will ensure that these people have the appropriate training.

The Academy Trust Board will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).

The Academy Trust Board will inform Buckinghamshire Council and the BSCP annually about the discharge of their safeguarding duties by completing the safeguarding self-assessment audit.

Designated Safeguarding Lead (DSL)

The DSL will take lead responsibility for safeguarding and child protection (including online safety including and understanding the filtering and monitoring systems in place). This will be made explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex B of KCSiE).

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively.

The DSL and any deputy DSLs will provide advice and support to staff in school and will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children.

During term time, the DSL or a deputy will always be available during academy hours for staff to discuss safeguarding concerns. The academy will maintain robust, clearly communicated cover arrangements for illness, leave and other periods when the DSL is unavailable, including arrangements for out-of-hours and out-of-term activities. A confidential reporting route will be monitored so that safeguarding concerns are received, triaged and acted upon without delay.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role and is expected to update their knowledge and skills at regular intervals to allow them to keep up with developments relevant to their role.

The DSL will liaise with the headteacher to inform them of issues and in particular ongoing enquiries under section 47 of the Children Act 1989 and police investigations.[1]

Headteacher

The headteacher will ensure that the policies and procedures adopted by the governing body are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The headteacher will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

All staff

All staff have a responsibility to provide a safe environment in which children can learn.

All staff must read and ensure they understand at least Part One and Part Five of KCSiE.

All staff must ensure they are familiar with the systems within school which support safeguarding, including the child protection and safeguarding policy, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to children who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

All staff should be aware of indicators of abuse, neglect and exploitation and so that they are able to identify cases of children who may be in need of help or protection. All staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about a child's welfare they must act on them immediately.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should know what to do if a child tells them they is being abused, neglected or exploited, and/or is otherwise at risk of involvement in criminal activity, such as knife crime, or involved in county lines drug dealing.

All staff should be aware of the process for community-based Family Help assessments:

• the criteria, including the level of need, for when a case should be referred to

Family Help support and services, provided at:

- Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
- Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)

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[1] See LA explanatory note on the requirements around children having an appropriate adult Schools-StopSearch-v2.3.pdf (squarespace.com)

- the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm)
- Section 31 of the Children Act 1989 (care and supervision orders), and
- Section 20 of the Children Act 1989 (duty to accommodate a child)
- and clear procedures and processes for cases relating to:
  - the abuse, neglect, and exploitation of children
  - children managed within the youth secure estate
  - disabled children

All staff should be aware of, and understand their role within the Early Help services, at school/college and local authority level Early Help - Buckinghamshire Safeguarding Children Partnership. This includes providing support as soon as a problem emerges, via universal services and community-based early help. The DSL will when necessary, refer via the MASH for the targeted early help level of Family Help. The DSL will share information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation of worries and needs (see Section 12: Information Sharing). In some cases, staff may be asked to act as the lead professional in undertaking an early help assessment.

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (SEN) (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of 'honour'-based abuse such as Female Genital Mutilation (FGM) or forced marriage.
- is a privately fostered child

Knowing what to look out for is vital to the early identification of abuse, neglect and exploitation and specific safeguarding issues such as child criminal exploitation and child sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's social care. In

these circumstances, any action taken should be shared with the DSL as soon as is practically possible. Details of the school's safeguarding team are at the front of this policy.

Professional Curiosity, Respectful Challenge and Escalation

All staff and volunteers must maintain professional curiosity when working with children, families and other professionals, seeking to understand the lived experience of the child and not accepting information at face value where safeguarding concerns may exist. Staff are expected to ask questions, explore inconsistencies, consider alternative explanations, and remain alert to signs of harm, neglect, exploitation or disguised compliance. Where there are differences of professional opinion, concerns about the quality of decision-making, or a belief that a child is not receiving an appropriate safeguarding response, staff must provide respectful professional challenge and seek timely resolution in the best interests of the child. If concerns remain unresolved, staff must follow the school's safeguarding escalation procedures and relevant multi-agency dispute resolution processes. A culture of constructive challenge, professional accountability and evidence-informed decision-making is essential to safeguarding and promoting the welfare of children. This approach reflects the expectations set out in *Working Together to Safeguard Children 2026*, which emphasises professional curiosity, mutual challenge and effective escalation as key features of strong safeguarding practice.

5. Induction & Training

The Academy Trust Board will ensure that all staff receive appropriate safeguarding and child protection training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and in line with advice from the BCSP. In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low-level concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE will be provided to new staff at induction.

The Academy Trust Board will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements the Academy Trust Board will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to

ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of all pupils.

6. Recognising concerns - signs and indicators of abuse.

All staff should be aware of indicators of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

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

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. All staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Risks to children include sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and recognise that children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL.

Indicators of abuse and neglect

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

The following indicators listed under the categories of abuse are not an exhaustive list:

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

(Source Keeping Children Safe in Education)

7. Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm and those safeguarding issues often overlap.

Behaviours linked to issues such as of drug taking and/or alcohol abuse, unexplainable and or/persistent absences from education, serious violence (including that linked to county lines) and consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes. Other safeguarding issues all staff should be aware of include:

Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy) and record these using the school/college's safeguarding system. This should be added to cpoms in a timely manner so any concerns can be addressed.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- Consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes. Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence. Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should be clear about the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. *[cross reference or link to school policy]* ***1**

Harmful sexual behaviour

The academy recognises a continuum from developmentally expected sexual behaviour through problematic and abusive behaviour to sexual violence. All reports will receive a safeguarding response, including incidents involving consensual or non-consensual sharing of nudes or semi-nudes. The DSL will consider the needs and safety of the child who may have been harmed, the child alleged to have caused harm and other children. Responses will be child-centred, proportionate, informed by risk and needs assessment, and will include referral to children's social care or the police where appropriate.

Early help

In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help.

Community-based Early Help assessment.

If children do not require the support of statutory children's services, the designated safeguarding lead (or a deputy) 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 carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including Section 17.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

Child criminal exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals, (particularly older children), and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Links to the Home Office’s County Lines advice is provided within the serious violence information on page 166. also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child’s immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed

by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation (FGM)

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers[2]. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour

[2] Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, education staff are well placed to identify these and other potential warning signs. In doing so they can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow their child protection policy and speak to their designated safeguarding lead or deputy. If staff feel that a child is in danger, they should call 999 or take them to A&E immediately. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Staff should add this to cpoms in the usual way, this will then be flagged up to the Mental Health Lead who will sign post the student/family to the correct service such as MHST,

Serious violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example immediately after school). Early, evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

Preventing Radicalisation and Extremism (The Prevent Duty)

The Prevent Duty protects children, young people and adults from the risk of radicalisation — a process where a person becomes vulnerable to extremist influences or drawn into supporting terrorist ideologies. The school recognises its statutory responsibilities under Section 26 of the Counter-Terrorism and Security Act 2015 and is fully committed to fulfilling the Prevent Duty as part of its wider safeguarding responsibilities. The school will take proportionate and age-appropriate steps to identify, assess and respond to concerns that a pupil may be vulnerable to extremist ideologies or influences. Staff are expected to remain vigilant to indicators of radicalisation, promote fundamental British values, encourage critical thinking, and create an inclusive environment in which respectful debate can take place and extremist narratives are challenged. All staff will receive appropriate Prevent training to enable them to recognise potential signs of radicalisation and understand referral pathways. Where

concerns arise, these will be acted upon in accordance with safeguarding procedures, including consultation with the Designated Safeguarding Lead (DSL) and, where appropriate, referral to external agencies, including Channel. The school will work in partnership with families, local authorities, safeguarding partners, police and other relevant agencies to ensure that children who may be susceptible to radicalisation receive timely support and protection, recognising that vulnerability to extremist influence should be addressed through the same child-centred safeguarding principles that apply to all forms of harm. Where a referral to Channel is made, relevant information will be shared with the police and partners in accordance with the Prevent duty, safeguarding responsibilities and data-protection law.

8. Children potentially at greater risk of harm

The Academy Trust Board recognises that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, in some cases, these children may find it difficult to communicate what is happening to them.

Alternative Provision

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

The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The management committee/proprietor will have regard to the following statutory guidance:

Alternative provision – DfE Statutory Guidance, and

Education for children with health needs who cannot attend school – DfE Statutory Guidance

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to complex safeguarding or welfare needs. Children may need this help due to abuse, neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The Academy Trust Board expects that the Local Authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best

interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both LAs and school to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services.

Children living in temporary accommodation

The academy will act on notifications that a child is living in temporary accommodation and consider the effect on safety, attendance, travel, health, learning and access to support. The DSL and attendance team will liaise with the local authority and other agencies where required, while avoiding assumptions about a family's circumstances.

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils, and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- The department's statutory guidance on school attendance Working together to improve school attendance https://www.gov.uk/government/publications/working-together-to-improve-school-attendance which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties for CME, which can be found in the department's statutory guidance: Children Missing Education. https://www.gov.uk/government/publications/children-missing-education This includes information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, along with how schools should be supporting local authorities with joint reasonable enquiries to help identify and support children missing in education.
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges. https://www.gov.uk/guidance/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges
- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy. https://www.gov.uk/government/publications/missing-children-and-adults-strategy

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

It is important that the school's procedures for unauthorised absence and for dealing with children who are absent from education are followed, particularly on repeat occasions, to help identify the risk of abuse, neglect and exploitation, including sexual exploitation, and to help prevent the risks of going missing in future. This includes when problems are first emerging but also where children are already known to LA children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where absence from education may increase known safeguarding risks within the family or in the community. As such, all staff should be aware of the school's unauthorised absence procedures and children who are absent from education procedures Staff must follow the academy's attendance and children-missing-education procedures.. This includes informing the LA if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the LA, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

Further information and support includes:

- schools' duties regarding children who are absent from education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points can be found in the DfE's statutory guidance: Children who are absent from education.
- General information and advice for schools can be found in the Government's Missing Children and Adults Strategy.
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges
- Statutory guidance for schools concerning children who are absent from education

- https://www.gov.uk/government/publications/working-together-to-improve-school-attendance
- Summary of responsibilities where a mental health issue is affecting attendance

Alternative Provision (AP)

The school recognises that pupils placed in Alternative Provision (AP) remain on the school roll and that the governing body and Headteacher retain overall responsibility for the pupil's education, welfare and safeguarding. In accordance with Section 19 of the Education Act 1996 and relevant Department for Education guidance, the school will ensure that any AP placement is suitable, safe, regularly reviewed and able to meet the pupil's educational, attendance, welfare and safeguarding needs. Prior to commissioning a placement, the school will undertake due diligence to assure itself that the provider has effective safeguarding policies, safer recruitment procedures, health and safety arrangements, staff training and robust systems for reporting concerns. The school will maintain active oversight of all pupils attending AP through regular review meetings, ongoing communication with providers, attendance monitoring, progress tracking and welfare checks. Daily or weekly attendance information will be obtained and scrutinised, and AP pupils will be considered within safeguarding and vulnerable pupil discussions where appropriate. Any concerns regarding attendance, missing education, exploitation, mental health, behaviour, welfare or the suitability of the placement will be acted upon promptly through the school's safeguarding procedures. The school will routinely evaluate the effectiveness of AP placements, challenge any concerns regarding provision quality or safeguarding practice, and work with parents, carers, local authorities and partner agencies to ensure that placements continue to meet the needs of the child and achieve positive outcomes.

Attendance as a Safeguarding Priority

The school recognises that attendance is a key safeguarding indicator and that frequent, prolonged or unexplained absence may be a sign of abuse, neglect, exploitation, poor mental health, family difficulties or other welfare concerns. Attendance is therefore monitored as an integral part of the school's safeguarding arrangements rather than solely as an educational measure. Attendance data is reviewed routinely by school leaders, attendance staff and safeguarding personnel to identify emerging concerns, patterns and trends. Particular attention is given to pupils who are persistently absent (attendance below 90%) and severely absent (attendance below 50%), as these thresholds may indicate increased vulnerability and a need for additional support or intervention. Attendance information is considered alongside safeguarding records, behavioural concerns, welfare information and other indicators of vulnerability to ensure that risks are identified at the earliest opportunity. The school will investigate unexplained absence, repeated patterns of absence, children missing education, part-time or reduced timetables and any failure to return to school following a period of absence. Attendance concerns may result in pastoral support, attendance action plans, home visits, early help assessments, multi-agency working or safeguarding referrals where appropriate. Children with persistent or severe absence will be subject to enhanced monitoring and regular review to ensure barriers to attendance are understood and addressed. The school will work proactively with parents, carers, the local authority and partner agencies to secure improved attendance while maintaining a child-centred approach. Where attendance concerns suggest that a child may be suffering or at risk of harm, safeguarding procedures will take precedence and appropriate referrals will be made without delay.

Elective home education (EHE)

Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs. In accordance with the School Attendance (Pupil Registration) (England) Regulations 2024, https://www.legislation.gov.uk/uksi/2024/208/made a school must make a return to the local authority when a pupil's name is deleted from the admission register. Where a parent/carer has expressed an intention to remove a child from school to educate them at home, schools and local authorities should, where appropriate and proportionate, seek opportunities to discuss the decision with parents/carers before arrangements are finalised. The aim is to ensure parents/carers are aware of the implications of elective home education and have considered what is in the best interests of their child. This may be particularly important where a child has special educational needs or disabilities, has a social worker, or is otherwise vulnerable. DfE guidance for local authorities on Elective Home Education https://www.gov.uk/government/publications/elective-home-education sets out the role and responsibilities of local authorities and their powers to engage with parents. Although this is primarily aimed at local authorities, schools should also be familiar with this guidance.

Children requiring mental health support

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

The Academy Trust Board will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system. Concerns must be recorded on the academy safeguarding-recording system and passed promptly to the DSL or a deputy, who will determine the appropriate internal or external referral route.

Staff can access further advice in a DfE guidance documents Preventing and tackling bullying and mental health and behaviour in schools which set out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of pupils.

The school's senior mental health lead will be a member of, or be supported by, the senior leadership team.

Looked after children and previously looked after children.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Academy Trust Board will ensure staff have the skills, knowledge and understanding to keep looked after children safe.

The Academy Trust Board will ensure there are arrangements in place so that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child. The role of the virtual head has been extended to include responsibility for promoting the educational achievement of children in kinship care.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. The Academy Trust Board recognise that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

For children who are care leavers, the DSL should have details of the LA Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern.

Children with SEN and disabilities, or health issues can face additional safeguarding challenges, both online and offline.

Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration.

Staff should also be aware that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Similarly, staff should be aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Staff also need to be mindful of children's cognitive understanding, for example, whether they are able to understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in school.

As such, any reports of abuse involving children with SEND will require close liaison with the DSL and SENCO.

Further information can be found in the DfE's:
SEND Code of Practice 0 to 25 years, and from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support

- Services (SENDIASS). SENDIASS offer information, advice and support for
- parents and carers of children and young people with SEND. All local
- authorities have such a service: Find your local IAS service
- (councilfordisabledchildren.org.uk)
    - Mencap - Represents people with learning disabilities, with specific advice and
- information for people who work with children and young people
    - NSPCC - Safeguarding children with special educational needs and
- disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and
- disabled children and young people

Children who are lesbian, gay, bisexual, or gender questioning

The Academy Trust Board acknowledge A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who

are.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

9. Opportunities to teach safeguarding

The Academy Trust Board will ensure that children and young people are taught about how to keep themselves and others safe, including online.

The Academy Trust Board recognise that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.

Relevant topics will be included within Relationships Education *(primary schools)* and Relationships and Sex Education (also known as Sex and Relationship Education) *(secondary schools)* and through Health Education *(all pupils in state funded schools)*, having regard to statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares children and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. *4

*4 Relationships Education, Relationships and Sex Education and Health Education guidance

The Academy Trust Board expect that the school's values and standards should be upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetables lessons and reinforced throughout the whole curriculum. This

whole-school approach will be fully inclusive and developed to be age and stage of development appropriate, and will tackle (in age-appropriate stages) issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise and abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard children and young people from potentially harmful and inappropriate online material.

Safeguarding in sport

The academy recognises that sport and physical activity can create particular safeguarding risks, including one-to-one coaching, changing arrangements, travel, overnight stays, physical contact, photography and the conduct of external coaches or clubs. The academy will ensure that staff, volunteers and providers working in sport are appropriately vetted, trained and supervised; codes of conduct and reporting routes are clear; and allegations or concerns are managed under this policy.

Safeguarding requirements relating to academy premises

The Academy Trust will meet the safeguarding requirements that apply to academy premises, including maintaining secure and suitable accommodation, appropriate supervision, safe access arrangements and effective management of visitors and contractors. Premises risks will be considered through health and safety, security, online safety and safeguarding risk assessments. Any defect or arrangement that may place a child at risk will be addressed promptly.

Young carers

Young carers may have substantial caring responsibilities that affect attendance, attainment, wellbeing and their ability to participate fully in academy life. Staff will be alert to signs that a pupil may be a young carer, listen to the child's wishes and feelings, and work with the family and relevant services to secure appropriate assessment and support. Safeguarding concerns will be referred without delay.

Children with medical conditions

Children with medical conditions may be more vulnerable to abuse, neglect, exploitation, disrupted education or unmet care needs. The DSL will work with the special educational needs coordinator, attendance staff, the designated teacher, healthcare professionals and parents or carers so that safeguarding and medical-support arrangements are coordinated. Staff must not assume that a change in presentation or behaviour is solely attributable to a medical condition.

Reasonable force and restrictive interventions

The academy will follow current Department for Education guidance on restrictive interventions, including reasonable force and seclusion. Any intervention must be lawful, necessary, proportionate

and the least restrictive response reasonably available. Staff will consider pupils' individual needs, including SEND, trauma and medical conditions. Relevant incidents will be recorded, reported and reviewed, and any safeguarding concern arising from an intervention will be referred to the DSL. The academy does not operate a no-contact policy.

10. Online safety and filtering and monitoring

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm.

The Academy Trust Board has had due regard to the additional information and support set out in KCSiE and ensures that the school has a whole school approach to online safety and has a clear policy on use of communications technology in school. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school adopts a whole school approach to online safety to protect and educate pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate.

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

- Content: being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, or radicalisation, extremism, misinformation, disinformation (including fake
- news) and conspiracy theories.
- Contact: being exposed to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying, and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or pupils are at risk this should be reported to the Anti-Phishing Working Group (https://apwg.org/).

The academy will review the effectiveness of filtering and monitoring at least once every academic year. The review will be led by the responsible senior leader with support from the DSL and IT support. It will include checks that filtering and monitoring operate appropriately on all internet-connected devices in all relevant locations, and a record will be kept of the checks, findings, decisions and actions. An annual online-safety risk assessment will inform the review.

to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

The review should include a member of the senior leadership team, the DSL, the IT service provider and a governor. The school should ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on cyber security including considerations can be found at Cyber security training for school staff - NCSC.GOV.UK Local arrangements are set out in the academy's Online Safety and Acceptable Use policies. In addition, schools and colleges should consider taking appropriate action to meet the Cyber security standards for schools and colleges which were developed to help them improve their resilience against cyber-attacks.
Meeting digital and technology standards in schools and colleges

The school's online safety policy outlines the appropriate filtering and monitoring which takes place on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

The school recognises that generative AI tools, such as Microsoft Copilot and ChatGPT, may support teaching, learning and administrative activities when used appropriately. Any use of AI must be safe, ethical, lawful and consistent with the school's safeguarding, data protection, acceptable use and assessment policies. Staff and pupils must not enter personal, confidential or sensitive information into AI tools and should critically evaluate AI-generated content, as it may be inaccurate, biased or incomplete. AI should be used to support, rather than replace, professional judgement, learning, creativity and independent thinking. The school will promote responsible AI use and ensure that any use of AI complies with Department for Education guidance and relevant statutory requirements. ***5**

School staff can access resources, information and support as set out in Annex B of KCSiE.

Department for Education guidance expects schools to develop and implement a mobile phone policy that creates a calm, safe and supportive environment. The Highcrest Academy's arrangements are set out in its Mobile Phone Policy and Behaviour Policy. These arrangements are kept under review, reflect the safeguarding risks created by unrestricted mobile data access, and include clear expectations for pupils, staff and parents or carers.

The academy maintains a clear policy on the use of mobile and smart technology. The policy should reflect the fact that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college can sexually harass, bully, and control others via their mobile and smart technology, share nudes or semi-nudes consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. Schools and colleges should carefully consider how this is managed on their premises and reflect this in their mobile and smart technology policy.

*5 artificial-intelligence-in-education

11. Procedures

If staff notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue they should record their concerns on the school's safeguarding management system or on a school recording form for safeguarding concerns and pass it to the DSL without delay, in Highcrest that is CPOMs.

What to do if you are concerned.

If a child makes an allegation or disclosure of abuse against an adult or other child or young person, it is important that you:

- Stay calm and listen carefully
- Accept what is being said
- Allow the child/young person to talk freely – do not interrupt or put words in the child/young person's mouth
- Only ask questions when necessary to clarify, do not investigate or ask leading questions, if required use TED questions (Tell Explain Describe)
- Reassure the child, but don't make promises which it might not be possible to keep
- Do not promise confidentiality
- Emphasise that it was the right thing to tell someone
- Reassure them that what has happened is not their fault
- Do not criticise the perpetrator
- Explain what must be done next and who has to be told
- Make a written/online record, which should be signed and include the time, date and your position in school
- Do not include your opinion without stating it is your opinion
- Pass the information to the DSL or deputy DSL without delay
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.

When a record of a safeguarding concern is passed to the DSL, the DSL will assess the concern and, taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or may be a child in need. If the DSL is unsure whether the threshold has been met, they will contact the MASH for advice and guidance.

Where a safeguarding concern does not meet the threshold for completion of a MASH Referral, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help including the school or college's local early help offer.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with BSCP procedures and timescales.

Where reasonably possible, the school is committed to obtaining more than one emergency contact number for each pupil.

School staff must ensure that they are aware of the procedure to follow when a child goes missing from education. Refer a child missing education | Buckinghamshire Council

Staff must report and record all concerns about child-on-child abuse immediately in accordance with the academy's safeguarding reporting procedure. The DSL will assess risk, determine immediate protective action and decide whether referral to children's social care or the police is required. Detailed arrangements are contained in the academy's Child-on-Child Abuse procedures.

12. Information sharing, record keeping and confidentiality

Information sharing is vital in safeguarding children by identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, the school understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. The UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025 place duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff will have regard to the Government guidance: Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

DSLs must keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme etc.

The school recognises that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or deputy DSL with other relevant members of staff. This will be on a 'need to know' basis and where it is in the child's best interests to do so.

A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils) or promise a child to keep a secret which might compromise the child's safety or wellbeing.

As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the UK GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetuated by a parent or carer, is in a refuge or another form of emergency accommodation, and the serious harm tests is met.

Ordinarily, the school will always undertake to share its intention and seek informed consent to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

The UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 provide that, the school has the authority to share information with the Local Authority "in the exercise of our official duties without seeking consent".

The "**public task basis**" as described in the legislation allows authorities to use data when they can demonstrate that the processing is to perform tasks that are set by national law. This means parental consent is not necessary for the obtaining and sharing of information

"Between agencies when that information is for child protection or safeguarding purposes or for an assessment of a child or children's needs.

"Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law." GDPR Article 6

The academy will follow KCSIE requirements for transferring safeguarding information. When a child leaves, the DSL will transfer the child-protection file separately from the main pupil file as soon as possible, within five days for an in-year transfer or within the first five days of a new term, using secure transit and obtaining confirmation of receipt. The transfer will include a clear, structured summary distinguishing current concerns and risks from historic information and identifying relevant context and ongoing support needs. The receiving setting will be asked to ensure that an appropriately trained person reviews the information promptly and seeks clarification if it is incomplete or unclear. Safeguarding information will be used to support, not disadvantage, the child.

Safeguarding File to another Education Setting. Where a child leaves the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The file will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

Further details on information sharing can be found:

- in Working Together to Safeguard Children, which includes a myth-busting guide to information sharing.
- at Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers, the seven golden rules for sharing information will be especially useful.
- the Information Commissioner's Office (ICO) guide to sharing information to safeguard children and young people in the education sector in the UK which is intended to help practitioners to feel confident to share personal information for safeguarding purposes.
- in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

13. Managing allegations made against teachers, including supply teachers, trainee teachers, other staff, volunteers and contractors

The school will follow the BSCP LADO - Buckinghamshire Safeguarding Children Partnership if a safeguarding concern or allegation is raised against an adult in a position of trust.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /volunteer may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they 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 applies to any child the member of staff, supply teacher, trainee teachers, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our school.

Concerns that do not meet the harm threshold will be dealt with in accordance with the school's policy for managing low-level concerns. Further detail is contained in the Staff Code of Conduct and Low-Level Concerns procedure.

If any member of staff has concerns that a colleague, supply teacher, trainee teacher, volunteer or contractor might pose a risk to children, it is their duty to report these to the headteacher. Where there is a concern/allegation about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school. In the event of

a concern/allegation about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) LADO(s).

Low-Level Concerns About Adults Working with Children

The school is committed to fostering a strong culture of safeguarding in which all concerns about the conduct, behaviour or actions of adults working with children are recognised, reported and addressed appropriately. A low-level concern is any concern, no matter how small, that an adult may have acted in a way that is inconsistent with the staff code of conduct, professional standards, or expected safeguarding practices, even if it does not meet the harm threshold. All staff are encouraged, and expected, to share low-level concerns promptly with the Headteacher or appropriate safeguarding lead to ensure that situations are assessed, recorded and managed consistently. The school recognises that effective management of low-level concerns helps to identify patterns of behaviour, promotes professional accountability, reinforces appropriate boundaries, protects children from potential harm, and safeguards staff from misunderstandings or unfounded allegations. Concerns will be handled fairly, proportionately and sensitively, with clear regard for confidentiality and natural justice. By maintaining an open and transparent reporting culture, the school aims to minimise the risk of abuse, strengthen safeguarding practice, and ensure that the welfare of children remains paramount at all times.

14. Use of school premises for non-school activities

The Academy Trust Board will ensure that where school facilities/premises are hired or rented out to organisations or individuals, sports associations or service providers to run community or extra-curricular activities appropriate arrangements are in place to keep children safe.

The Academy Trust Board will seek assurance that the body concerned has appropriate child protection and safeguarding policies and procedures in place, including inspecting these as needed. Arrangements will also be put in place for the body hiring or renting the school facilities or premises to liaise with the school on these matters where appropriate.

These arrangements will apply regardless of whether or not the children who attend any of these services or activities are children on the school roll.

Where a lease or hire agreement is entered into the Academy Trust Board will ensure safeguarding requirements are included as a condition of use and occupation of the premises; this will make clear that any failure to comply would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

15. Whistleblowing

The Academy Trust Board recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example, pupils in the school or members of the public.

The Academy Trust Board would wish for everyone in the school community to feel able to report any child protection/safeguarding concerns through existing procedures within school, including the whistleblowing procedure adopted by the Academy Trust Board where necessary (5.4 Whistleblowing – Buckinghamshire SCP MAPP Resource). However, for members of staff who do not feel able to raise such concerns internally, there is a NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00am to 8.00pm, Monday to Friday) or email: help@nspcc.org.uk

16. Useful Contacts:

Buckinghamshire Children's Social Care & Multi-agency Safeguarding Hub (MASH)	**For urgent safeguarding concerns the quickest way to let our MASH Team know is by calling them on:** • 01296 383 962 **between 9am to 5:30pm Monday to Thursday, 9am to 5pm Friday.** • 0800 999 7677 **before 9am, after 5:30pm (5pm on a Friday) or at weekends (Emergency Duty Team).**
Police	**101 or for emergency: 999**
FGM - Mandatory reporting	**Police on 101**
Local Authority Designated Officer for Allegations against staff (LADO)	**secure-lado@buckinghamshire.gov.uk** **Telephone: 01296 382070**
Children and Young People with Disabilities 0-25 years	
Local multi-agency procedures, guidance and Training: Buckinghamshire Safeguarding Children Partnership	Home - Buckinghamshire Safeguarding Children Partnership
NSPCC	**0800 800 5000**
Report Abuse in Education NSPCC Helpline	**0800 136 663**
Childline	**0800 1111**
Government's Whistle-blowing Service via NSPCC Report Line	**0800 028 0285**
Forced Marriage Unit	**Tel: 020 7008 0151** From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm) Out of hours: 020 7008 1500 (ask for Global Response Centre) Email: fmu@fco.gov.uk
Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)	Report through GOV.UK: www.gov.uk/report-extremism
Disclosure and Barring Service	**Tel: 03000 200 190** Email: customerservices@dbs.gov.uk
Teaching Regulation Authority	**Tel: 020 7593 5392** Email: misconduct.teacher@education.gov.uk