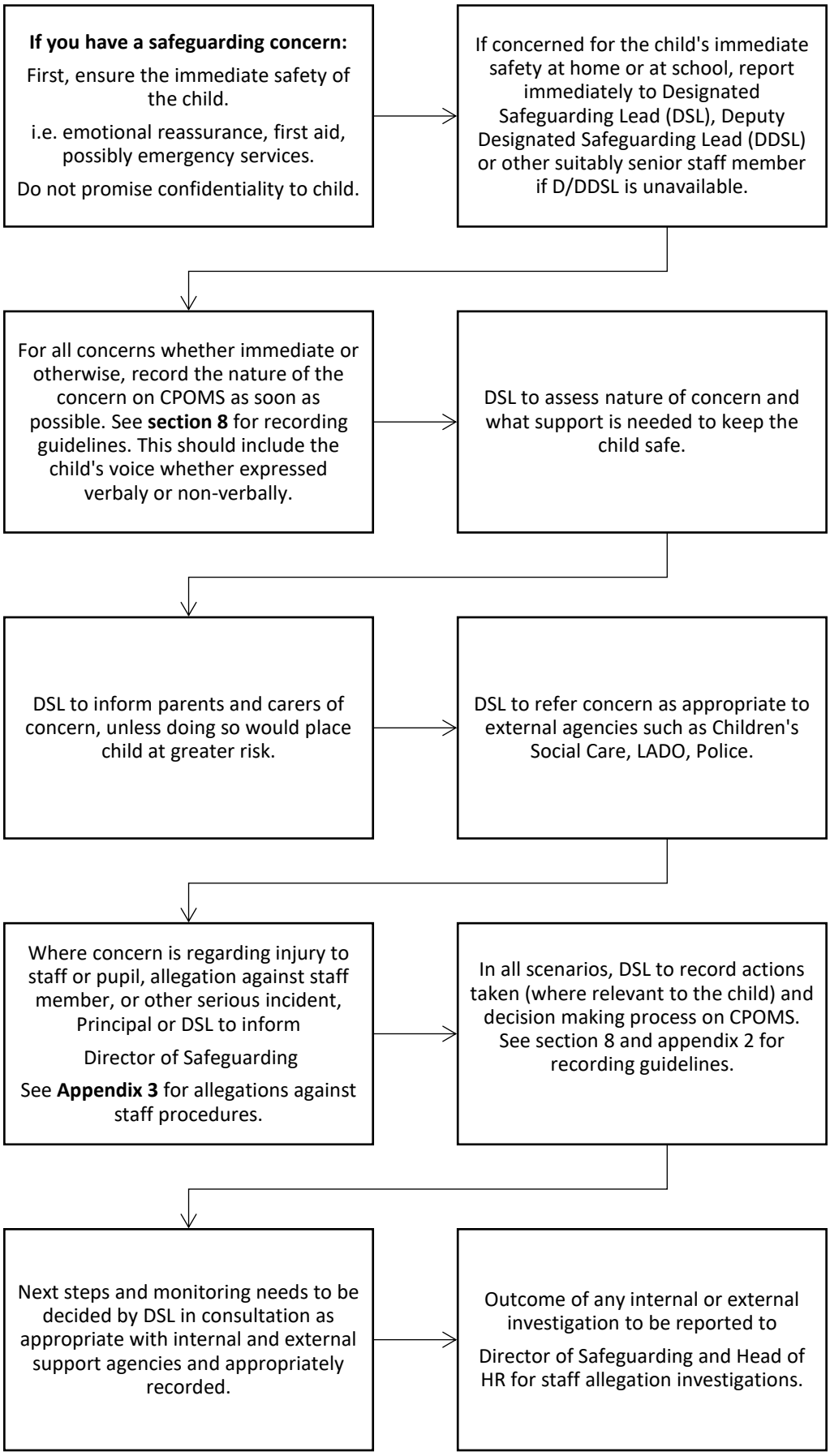
Liberty Academy Trust

Schools Safeguarding Children and Young People (Child Protection) Policy

Date	September 2026
Written By	LAT Director of Safeguarding
Ratified By Trustees	
Review Date	September 2027

Safeguarding Flowchart



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1. Safeguarding Policy Principles

1.1. This policy has been ratified by the Trustees of Liberty Academy Trust (LAT), is published on school websites and is available in hard copy to parents/carers on request. This policy can be made available in large print or other accessible format if required.

1.2. This policy and its procedures apply wherever staff or volunteers are working with pupils even where this is away from the school, for example on an educational visit. It also applies where there is Early Years Foundation Stage (EYFS) provision and Post-16 provision.

1.3. *Keeping Children Safe in Education 2026* defines safeguarding and promoting the welfare of children as:

1.3.1. Providing help and support to meet the needs of children as soon as problems emerge;

1.3.2. protecting children from maltreatment, whether that is within or outside the home, including online;

1.3.3. Preventing the impairment of children's mental and physical health or development;

1.3.4. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

1.3.5. taking action to enable all children to have the best outcomes.

1.4. Every pupil should feel safe and protected from any form of harm, abuse or exploitation. The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

1.5. As is stated in Part one: Paragraph 2 of *Keeping Children Safe in Education (2026)*:

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. 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.".

1.6 Everyone at the school will maintain an attitude of **'it could happen here'** where safeguarding is concerned.

1.7 We know that autistic children are potentially more vulnerable, because they may find it difficult to communicate with others, struggle with social interaction or have difficulties understanding people's motives, they may be less able to report abuse and thus be more vulnerable to it. This necessitates greater vigilance among professionals in recognising, reporting and investigating potential signs of abuse as well as ensuring that safeguarding issues remain on the agenda when working with autistic children and young people.

1.8 The Principal and Designated Safeguarding Lead **must** take responsibility in ensuring all reasonable measures to:

1.8.1 Adopt a child-centred approach, ensuring that there is a culture of vigilance where staff actively listen and observe all children and young people to identify concerns, seeking wishes and feelings of children through various media. The child's voice (whether speaking or non-speaking) will be actively sought when addressing any concerns or liaising with other agencies.

1.8.2 Ensure that we practice safer recruitment in checking the suitability of staff and volunteers, including Trustees, School Local Committee members and staff employed by another organisation, to work with children and young people and maintain an up-to-date Single Central Record in line with *Keeping Children Safe in Education 2026*.

1.8.3 Ensure that where staff from any other organisation are working with our pupils on site or off site, we require written confirmation that appropriate safeguarding checks have been completed on those staff (including Alternative Provision and Tutoring services).

1.8.4 Follow the local inter-agency procedures of the Local Safeguarding Partnership (three Safeguarding partners: the local authority, the Integrated Care Board (ICB, previously CCG) and the Chief Officer of Police).

1.8.5 Be alert to signs of harm, abuse, exploitation and neglect, both in the school, from outside (including within the community, at home and online) and to protect each pupil from any form of abuse, whether from an adult or another pupil (child on child abuse).

1.8.6 Deal appropriately with every concern or disclosure and support children and families through appropriate safeguarding, Family Help, Early Help and Child Protection processes, including any agreed Child Protection Plan, Child in Need Plan, Family Help Plan or Team Around the Child (or equivalent plan).

1.8.7 Deal appropriately with any staff allegation or low-level concern regarding staff conduct within the school and the community.

1.8.8 Be aware that behaviours linked to issues such as drug taking, alcohol misuse, missing education and child on child abuse such as making, creating, sharing or possessing nudes and semi-nudes, including AI-generated images and/or videos, deepfakes and digitally altered content, can be signs that children are at risk of significant harm.

1.8.9 Be alert to the needs of Autistic individuals including any medical needs, physical, mental health conditions and communication needs.

1.8.10 Identify children who may be more susceptible to radicalisation and know what to do when they are identified.

1.8.11 Identify children who may be more vulnerable to exploitation (criminal, including through county lines and sexual), and know what to do when they are identified.

1.8.12 Operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse.

1.8.13 In line with the Revised Prevent Duty guidance 2024 and Section 26 of the *Counter-terrorism and Security Act 2015,* schools 'in the exercise of their functions, are to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism".

- Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.
- Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

1.8.14 Teach pupils about safeguarding and online safety, as appropriate to their understanding and learning needs for example through use of online resources, through the curriculum and PSHE (including Relationship, Sex and Health Education), together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and information about who they should turn to for help.

1.8.15 Take all practicable steps to ensure that school premises are as secure as circumstances permit.

1.8.16 Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our school or in our local area.

1.8.17 Be aware that some children may be more vulnerable to abuse, neglect, exploitation or discrimination due to protected characteristics, personal circumstances, previous experiences, disability, communication needs, family circumstances or other identified vulnerabilities, and ensure that appropriate safeguarding support is provided.

1.8.18 Ensure all staff understand that they are responsible for reporting all safeguarding and child protection concerns that they become aware of.

- Staff **must** report to the Designated Safeguarding Lead (or deputy) and document all concerns and action taken into CPOMS or otherwise as directed by the DSL.
- All staff are provided with training on how and when to use the reporting system by the Designated Safeguarding Lead upon Induction and annually thereafter.

1.8.19 Design and operate procedures which, so far as is possible, ensure that teachers and others who have not done wrong are not prejudiced by false allegations.

1.8.20 Children and young people and their parents and carers should be informed of LAT child protection procedures, and what to expect, in their preferred communication and appropriate to their understanding.

2. Statutory and Regulatory Framework

2.1. This policy has regard to regulations and standards issued by the Secretary of State for Education (**DfE**) in accordance with:

2.1.1. Section 94 of the *Education and Skills Act 2008*

2.1.2. Sections 29 and 38 of the *Counter-Terrorism and Security Act 2015*

2.1.3. *Prevent duty guidance for England and Wales 2024*

2.1.4. *Keeping Children Safe in Education 2026*

2.1.5. The *Education (Independent School Standards) (England) Regulations 2014*

2.1.6. *Statutory Framework for the Early Years Foundation Stage 2024*

2.1.7. *The Children Act 1989*

2.1.8. Section 175 of the *Education Act 2002*

2.1.9. *Female Genital Mutilation Act 2003*

2.1.10. *The Children Act 2004*

2.1.11. *The Children and Families act 2014*

2.1.12. *The Children and Social Work Act 2017*

2.1.13. *The Designated teacher for Looked after and previously Looked after children February 2018*

2.1.14. *Working Together to Safeguard Children 2026*

2.1.15. *What to do if you are worried a child is being abused: advice for practitioners 2015*

2.1.16. *Child Sexual exploitation: Definition and guide for practitioners 2017*

2.1.17. *Children Missing Education 2024*

2.1.18. *Multi-Agency statutory guidance on female genital mutilation 2020*

2.1.19. *Disqualification under the Childcare Act (2006) July 2018*

2.1.20. *Criminal Exploitation of children and vulnerable adults: County Lines Guidance September 2020*

2.1.21. *Help, protection, education: concluding the Children In Need Review June 2019*

2.1.22. *Teaching Online safety in Schools June 2023*

2.1.23. *Relationships Education, Relationships and Sex Education (RSE) and Health Education, DfE 2021*

2.1.24. *Working together to Improve school attendance 2024*

2.1.25. *Behaviour in schools DfE 2024*

2.1.26. *Generative artificial intelligence (AI) in education DfE 2025*

2.1.27. *Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.*

2.1.28. *Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement* *DFE 2026*

2.1.29. *Information Sharing Duty Statutory Guidance (DfE, September 2026) issued under section 16LA of the Children Act 2004.*

3. Associated Policies

This Policy should be read alongside the school's:

3.1.1. Accessibility in schools policy

3.1.2. Attendance policy

3.1.3. Behaviour policy

3.1.4. Complaints policy

3.1.5. Exclusions policy

3.1.6. Admissions policy

3.1.7. Online Safety and AUP of ICT Policy

3.1.8. Artificial intelligence Acceptable use agreement

3.1.9. Anti-bullying in Schools policy

3.1.10. Data Protection policy

3.1.11. Whistleblowing policy

3.1.12. Safer Recruitment Policy and Guidance for LAT Schools & Services

3.1.13. Staff Code of Conduct

3.1.14. Relationships and Sex Education policy

3.1.15. Restrictive Physical intervention Practice in Schools

3.1.16. Intimate Care policy

3.1.17. EDI Policy

3.1.18. Staff Making Home visits policy

4. The Designated Safeguarding Lead

4.1. The Principal **must** appoint a senior member of staff with the necessary status and authority (Designated Safeguarding Lead) to take lead responsibility for matters relating to safeguarding, child protection, welfare and online safety (including understanding the filtering and monitoring systems in place).

4.2. **The Designated Safeguarding Lead contact details can be found in section 20 (contacts).**

4.3. The main responsibilities of the Designated Safeguarding Lead are set out in **Appendix 1** and are in line with guidance taken from *Annex B, Keeping Children Safe in Education 2026*.

4.4. If the Designated Safeguarding Lead is unavailable the Deputy Designated Safeguarding Lead will carry out their duties (see contact in section 20).

4.5. In this policy, reference to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Lead where the Designated Safeguarding Lead is unavailable. However, the **lead responsibility for Safeguarding and Child Protection remains with the Designated Safeguarding Lead and cannot be delegated.**

4.6. Either the Designated Safeguarding Lead or Deputy **must** be available to staff and pupils during the school day, either directly or by telephone.

4.7. The school will maintain appropriate arrangements for the monitoring of safeguarding communications, including the use of shared safeguarding email accounts to ensure that concerns, referrals and communications are reviewed and responded to without unnecessary delay.

4.8. If the DSL is 'off-site', this **must** be communicated to all staff. If both the DSL and Deputy DSL are not available, staff should share concerns with another member of the senior leadership team who should contact LAT Director of Safeguarding immediately, should further advice/support be needed (see contact page for details).

4.9. The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead(s) **must** have undertaken the Local Authority Designated Safeguarding Lead training (including local inter agency working), to provide them with the knowledge and skills required to carry out the role, and **must** attend full refresher training at two-yearly intervals (minimum), attend additional safeguarding training on key issues, and attend updates and briefings at least annually.

4.10. The Designated Safeguarding Lead (as a minimum) should also have undertaken Prevent training and Online Safety training and be able to support the school with regards to their requirement under the Prevent Duty.

5. Duty of Employees, Trustees and Volunteers

5.1. Every employee, Trustee and School Committee members of the school as well as every volunteer who assists the school (hereinafter referred to in this policy as 'Staff') is under a general legal duty:

5.1.1. To protect children from harm, abuse, exploitation and neglect;

5.1.2. To be aware of the school's child protection procedures and to follow them;

5.1.3. To know how to access and implement the school's child protection procedures, independently if necessary;

5.1.4. To keep a sufficient record of any significant concern or complaint, conversation or event in accordance with this policy; and

5.1.5. **To report any matters of concern to the Designated Safeguarding Lead without delay.**

5.2. The Board of Trustees ensures that the school's safeguarding arrangements take into account the procedures and practice of the Local Safeguarding Partners and *Keeping Children Safe in Education 2026*.

5.3. The Board of Trustees ensure that there are appropriate procedures and policies in place to support timely and appropriate action to be taken to safeguard a child and promote their welfare, and that regularly updated training takes place with all staff and volunteers.

5.4. The Board of Trustees ensure all Liberty schools meet the *DfE filtering and monitoring standards* which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage IT filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning

- Have effective monitoring strategies in place that meet their safeguarding needs

5.5. The Board of Trustees review compliance with the above standards at regular intervals and at least annually.

5.6. Trustees ensure that Safer Recruitment principles are adhered to in accordance with *Part 3, Keeping Children Safe in Education 2026,* including the additional requirement to undertake online searches for all shortlisted candidates - this is outlined in the Safer Recruitment Policy and LAT Online searches guidance.

5.7. The school will ensure that appropriate safeguarding and recruitment checks are undertaken for volunteers in accordance with *Keeping Children Safe in Education 2026*. Volunteers who undertake regulated activity with children, including those who teach, train, instruct, care for or supervise children on a frequent basis, or who undertake overnight supervision, will be subject to an enhanced DBS check, including a children's barred list check where required.

5.8. The Board of Trustees review any serious incidents and where necessary instructs a post-incident review with the support of LAT Director of Safeguarding, to ensure all policies and procedures are being adhered to and have an oversight of annual Safeguarding Audits conducted in all schools.

5.9. The Board of Trustees ensures there are clear lines of accountability for Safeguarding, outlined in the scheme of delegation. Trustees are assured of Safeguarding policies, systems and practice via termly reports provided by the Director of Safeguarding and Trustee school visits.

5.10. A designated teacher is appointed by the Principal to promote the educational achievement of children who are looked after / in care and previously looked after or currently open to a social worker (**see 11.6 for contact details of the designated teacher for looked after children**).

5.11. As the central point of contact for the school, the designated teacher **must** ensure appropriate and timely liaison with the Virtual School and where appropriate, the Virtual School Head.

5.12. The Trustees ensure all staff have the skills, knowledge and understanding necessary to keep looked after children safe. In particular, they ensure that the information they need in relation to the child's looked after status, their care arrangements and the levels of authority delegated to the carer by the authority looking after them, is made available to them.

6. Training

6.1. All staff, including trainee teachers, temporary staff, agency staff, contractors and volunteers, are provided with safeguarding induction training on commencement of their role and receive annual refresher training thereafter.

Induction training includes:

- This Safeguarding and Child Protection Policy;
- The Staff Code of Conduct, including the Whistleblowing Policy, Staff Acceptable Use Agreement (AUP) and Behaviour Policy;
- The role of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs), including their contact details and cover arrangements;
- The school's procedures for responding to safeguarding concerns and recording concerns on CPOMS;
- Safeguarding procedures relating to children who are absent from education, as outlined in Appendix 4 of this policy and the LAT Attendance Policy;
- Part 1 of *Keeping Children Safe in Education 2026* for all staff, and Annex A for staff who work directly with children;
- Online safety, including acceptable use of technology, filtering and monitoring arrangements and safeguarding risks associated with artificial intelligence (AI);
- Autism awareness and the additional vulnerabilities that autistic children and young people may experience.

Staff who may provide intimate care must confirm that they have read and understood the Intimate Care Policy and have received appropriate training before providing support

6.2. **Mandatory Training**

All staff, Trustees and School Committee Members complete the following training as a minimum (online modules are optional for volunteers unless otherwise directed):

- Safeguarding and Child Protection Training (National College Level 2 or equivalent), including online safety, filtering and monitoring, and appropriate use of AI;

- Prevent Duty Training (Home Office, National College or equivalent approved provider).

6.3. **Child Protection and Safeguarding training**

6.3.1. All staff, including the Principal, receive a copy of this policy and Part 1 of *Keeping Children Safe in Education 2026* and must confirm that they have read and understood these documents. Staff who work directly with children will additionally be provided with Annex A and must confirm that they have read and understood it.

6.3.2. All staff must read the Staff Code of Conduct/Staff Handbook, the Whistleblowing policy and the Behaviour Policy, and must confirm that they have read and understood these documents. A record of this is maintained within Smartlog for training and auditing purposes.

6.3.3. The Principal and all staff members undertake safeguarding and child protection training which is updated at least annually and informed by advice, priorities and emerging themes identified by the Local Safeguarding Partners.

6.3.4. In addition to formal training, the Designated Safeguarding Lead provides regular safeguarding updates through staff meetings, briefings, supervision, professional development activities and written communications to ensure that staff knowledge and practice remain current.

6.3.5. Staff development also includes training on Prevent, online safety (including filtering and monitoring responsibilities), safeguarding risks associated with artificial intelligence (AI), and the responsibility of all staff to teach and promote safeguarding, including online safety, through the curriculum and wider school life.

6.3.6. Safeguarding training will include, as appropriate to role:

- Keeping Children Safe in Education 2026;
- Safeguarding and Child Protection responsibilities;
- Family Help, Early Help and identifying children who may benefit from additional support;
- The role and responsibilities of the DSL and DDSLs;
- Prevent Duty, radicalisation and extremism;
- Online Safety, including the 4Cs (Content, Contact, Conduct and Commerce);
- Filtering and Monitoring responsibilities;
- Appropriate and safe use of Artificial Intelligence (AI)and AI-assisted online abuse ;
- Harmful Sexual Behaviour (HSB);

- Recognising age-appropriate versus problematic sexual behaviour;
- Responding appropriately to reports of Harmful Sexual Behaviour;
- Child-on-child abuse, including sexual violence and sexual harassment;
- Sharing of nudes and semi-nudes, including AI-generated sexual content, deepfakes, synthetic media and emerging technology-related safeguarding risks;
- Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and County Lines;
- Female Genital Mutilation (FGM), Forced Marriage and other forms of so-called Honour-Based Abuse;
- Domestic Abuse and its impact on children;
- Children Missing Education and persistent absence;
- Trauma-informed practice and understanding Adverse Childhood Experiences (ACEs);
- Mental Health and emotional wellbeing;
- Information Sharing, confidentiality and record keeping;
- Professional curiosity and recognising indicators of abuse, neglect and exploitation;
- Whistleblowing and Low-Level Concerns procedures;
- Equality, Diversity and Inclusion considerations within safeguarding practice;
- Autism awareness and understanding the additional vulnerabilities of autistic children and young people.

6.3.7. Relevant staff involved in recruitment, including the Principal, DSL, School Business Manager and nominated School Committee Members, undertake Safer Recruitment Training at least every three years to ensure robust recruitment and vetting procedures are maintained.

6.3.8. School leaders will regularly assess the level, content and focus of safeguarding training required in response to local safeguarding priorities, emerging risks, statutory updates, safeguarding reviews, audits and quality assurance activities.

6.3.9. All members of the LAT Central Team, School Committee Members and Trustees must undertake safeguarding training appropriate to their role on at least an annual basis to enable them to fulfil their safeguarding responsibilities effectively.

6.3.10. All staff must complete the Autism Education Trust Work-based CPD Programme (or equivalent approved training) as part of their induction and ongoing professional development. Staff should

remain mindful of the additional safeguarding vulnerabilities that autistic children and young people may experience.

6.3.11. School-based staff access behaviour management and de-escalation training, including the appropriate use of Restrictive Physical Intervention (RPI) through the Team Teach approach and any other approved Trust methodology.

7. Whistleblowing

7.1. All staff are required to report whistleblowing matters to the Principal.

7.2. If the Principal is absent or if the whistle blow relates to the Principal, staff are required to report directly to LAT Director of Safeguarding or LAT Chair of Trustees.

7.3. Staff **must** report any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm.

7.4. Whistleblowers **must** be reassured that a disclosure made in good faith will never lead to a detrimental position for their employment.

7.5. See **Appendix 3** and the LAT Whistleblowing Policy for full details of the procedures to be followed in relation to allegations against staff.

7.6. All guidance stated in *Part 4 of Keeping Children Safe in Education 2026* regarding the management and record keeping of whistleblowing allegations **must** be followed, which includes liaison with the Local Authority Designated Officer as appropriate.

7.7. The Local Authority Designated Officer (LADO) contact information is detailed within **section 11** of this policy.

8. Procedures

8.1. **Cause for concern / Disclosure of harm, abuse or exploitation**: Every disclosure or suspicion of abuse from within or outside the school is taken seriously and action taken in accordance with this policy. Staff **must** follow reporting expectations as set out below and within **Appendix 2**.

8.2. **Action staff must take:** A member of staff, agency/supply staff or volunteer suspecting or hearing a disclosure of abuse (including child on child abuse and Online safety concerns):

8.2.1. **Must** listen carefully to the child or young person and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;

8.2.2. **Must** not ask leading questions, i.e. a question which suggests its own answer;

8.2.3. **Must** reassure the child or young person but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken;

8.2.4. **Staff are not to view or forward illegal images of a child.** Where concerns involve AI-generated sexual content, deepfakes, synthetic media or digitally manipulated images involving children, staff must not share, download or distribute the material and must report concerns immediately to the Designated Safeguarding Lead.

8.2.5. **Staff must keep a sufficient written record of the conversation or concern within CPOMS**. This record should be made as soon as possible and on the same working day. The record should include:

- the date and time of the disclosure or concern.
- the location that the conversation or concern took place.
- a clear and comprehensive summary of the concern including the child's voice where possible.
- details of how the concern was followed up and resolved.

- a note of any actions taken, information shared or withheld, decisions reached, rationale for those decisions and the outcome.
- The CPOMS record must clearly outline those involved using initials for students and full names and roles of professionals and family members.
- The CPOMS record should be factual and not contain the opinion of the staff member.
- The CPOMS record should not contain information relating to staff investigations or suspensions beyond the initial concern relating to the child.

8.2.6. Where a concern is significant, such as regarding injury to pupils or staff, serious incidents, and any external referral, contact should be made directly with appropriate staff such as the DSL, Principal, and central staff such as the Director of Safeguarding. Recording a concern on CPOMS is not a substitute for this reporting process.

8.2.7. **If there is an immediate Child Protection matter, staff must inform the Designated Safeguarding Lead (or deputy) verbally, as soon as possible and follow up with a CPOMS log.**

8.3. The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in **Appendix 2**.

8.4. Whilst all of our pupils are identified within the criteria for those potentially requiring Early Help (in accordance with KCSIE 2026), if a member of staff is concerned that a pupil may be in need of additional support via an Early Help Assessment or are concerned they are suffering harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible.

8.5. All staff should be aware that children may not be able to, feel ready, or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened, this could be due to their vulnerability, disability and/or sexual orientation or language barriers.

8.6. It is important to recognise that for some children, the abuse may be normalised and they are not aware that it is abuse/harmful. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child.

8.7. It is also important that staff determine how best to build trusted relationships with children and young people, giving opportunities and facilitating communication.

8.8. For children who may be pre-verbal and/or non-speaking, staff **must** be alert to changes in behaviour and signs of harm and distress.

8.9. **If at any point, there is a risk of immediate harm to a child a referral should be made to children's social care immediately and Police if necessary**.

8.10. Prior to making the referral, attempts to consult with parents/carers should be made unless there are reasonable grounds for suspecting that in doing so, the pupil will be at risk of further harm.

8.11. Anybody can make a referral.

8.12. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Contact details of local children's social care can be found in **section 11** of this policy. Children's social care have a statutory duty to provide a response to any referrals made however when this has not been received in a timely manner, the school must continue to pursue the response with urgency.

8.13. No single person working with children can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

8.14. All staff are particularly reminded:

8.14.1. From October 2015, in accordance with section 5B of the *Female Genital Mutilation Act 2003,* teachers **must personally report** to the Police, 'known' cases of FGM, cases where they discover that an act of female genital mutilation appears to have been carried out, or a child/young person discloses it has taken place. The teacher should also discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate.

8.14.2. From July 2015, under the *Prevent Duty*, concerns about children who may be at risk of being drawn into terrorism **must be reported** to the school's Designated Safeguarding Lead, who will make a referral as appropriate via the Channel Panel and/or to Children's Social Care, in line with the Local Authority protocol.

8.14.3. **Operation Encompass:** The school participates in Operation Encompass and recognises the statutory arrangements that require police to notify schools when a child may have been affected by domestic abuse. Operation Encompass notifications will be shared with the Designated Safeguarding Lead (or appropriately trained deputy) and will be treated as a safeguarding concern. The school will consider what support, monitoring or intervention may be required and will record actions taken in accordance with school safeguarding procedures.

8.15. Autistic children and young people can face additional safeguarding challenges because:

8.15.1. there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's diagnosis without further exploration;

8.15.2. children with SEND may be more vulnerable to peer group isolation or bullying/child on child abuse (including prejudice-based bullying) than other children;

8.15.3. there is potential that children with SEND or certain medical conditions can be disproportionally impacted by behaviours such as bullying/child on child abuse without outwardly showing any signs, pupils may hide or mask the difficulties they experience; and

8.15.4. there may be communication barriers and children and young people's communication may not be understood by the adults around them; and

8.15.5. difficulties in managing or reporting these challenges.

8.16. At our school we identify pupils who might need more support to be kept safe or to keep themselves safe by:

8.16.1. ensuring the DSL and SENCo work closely, sharing information regarding concerns relating to pupils/students;

8.16.2. pastoral support is targeted as required;

8.16.3. Where pupils'/students' voices are regularly captured, adaptations are made and resources used to capture the views of individuals who may either be non - speaking, or typically use other methods of communication than speech;

8.16.4. reporting all notable changes in behaviour, mood or presentation are reported to the DSL;

8.16.5. reporting all unexplained injuries and injuries for which there have been where conflicting explanations, to the DSL.

8.17. Action by the Designated Safeguarding Lead:

8.17.1. On being notified of a concern, disclosure or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:

8.17.1.1. The local inter-agency procedures of the Local Safeguarding partnership;

8.17.1.2. Responsibilities outlined in *Keeping Children Safe in Education 2026, particularly Annex B;*

8.17.1.3. Where relevant, local information sharing protocols relating to Channel referrals[1];

8.17.1.4. The nature and seriousness of the concern or disclosure. Information regarding a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist activity, will always be referred to local authority children's social care services and the police;

8.17.1.5. The child's wishes and feelings; and

8.17.1.6. Duties of confidentiality, so far as applicable.

8.17.2. If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead **must** consult with the LAT Director of Safeguarding. Schools may also contact the local authority children's social care on a 'hypothetical' basis without identifying the family.

8.17.3. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to the local authority children's social care services **must** be made without delay (and in any event within 24 hours).

8.17.4. If the initial referral is made by telephone, the Designated Safeguarding Lead **must** confirm the referral in writing to the local authority children's social care services within 24 hours.

[1] Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. KCSIE 2025 p158

Working Together to Safeguard Children 2026 states "Within one working day of a referral being received, local authority children's social care should acknowledge receipt to the referrer and a social work qualified practice supervisor or manager should decide next steps and the type of response required."

If no response or acknowledgment is received within this timeframe, the Designated Safeguarding Lead should contact the local authority children's social care services again.

8.17.5. Whether or not the school decides to refer a particular concern to the local authority children's social care services or the police, the parents/carers and pupil will be informed of their right to make their own complaint or referral to local authority children's social care services or the police and will be provided with contact names, addresses and telephone numbers, as appropriate.

8.17.6. In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of Early Help or additional support from one or more agencies, the Designated Safeguarding Lead will liaise with the local Early Help team and /or children's social care and where appropriate an inter-agency assessment will take place, including use of the Early Help Assessment / Team Around the Child approaches, as necessary. Details of the Early Help Hub/Team can be found in contacts, **section 20** of this policy.

8.17.7. Where relevant, the school will co-operate with the Channel Panel, the police and/or children's social care in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is susceptible to being drawn into terrorism. The school must respond to requests for information from the police promptly and in any event within 48 hours.

8.17.8. In circumstances where it has been identified that it may be necessary to conduct a search of a student/pupil for a prohibited item (as outlined in the Behaviour Policy), parents/carers should be contacted prior to conducting the search. In circumstances where it may be necessary to contact the Police for support/guidance in relation to a search, parents/carers will again be notified and where necessary an appropriate adult will be nominated in support of this child – in accordance with guidance outlined in Annex C of *Keeping Children Safe in Education 2026* and PACE Code C 2019.

9. Early Help and Family Help

9.1. In accordance with *Keeping Children Safe in Education 2026* and *Working Together to Safeguard Children 2026*, all staff should be prepared to identify children and young people who may benefit from Early Help and Family Help services.

9.2. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to adolescence. Early Help may be provided by a single agency or through a coordinated multi-agency response and seeks to prevent concerns from escalating. This may include universal services and community-based early help where needs can be met through support available within the community or through a single agency. Depending on the needs of the child and family, an Early Help Assessment and Team Around the Child (TAC) approach may be used. The lead professional may be a member of school staff or a practitioner from another agency, depending on the circumstances of the case.

9.3. Family Help is the multi-agency system of support described within Working Together to Safeguard Children 2026 and is intended to provide effective support to children and families at the earliest opportunity. Family Help may involve practitioners from education, health, social care and other partner agencies working together to identify strengths, address needs and improve outcomes for children. Where additional coordinated intervention is required, support may be provided through the targeted early help level of Family Help. A Family Help Lead Practitioner may be identified to coordinate support and ensure that children and families receive the right help at the right time.

9.4. The school will work collaboratively with safeguarding partners, children and families to ensure that support is coordinated effectively and reviewed regularly. The views, wishes and lived experiences of children will be sought and taken into account when considering what support is required and when reviewing outcomes.

9.5. The school recognises that children and families living in temporary accommodation may experience additional vulnerabilities that can affect attendance, wellbeing, educational engagement and safeguarding. Where the school is notified that a child has been placed in temporary accommodation, this information will be considered as part of any safeguarding, welfare, attendance or support planning arrangements.

9.6. As outlined in *Keeping Children Safe in Education 2026*, staff should, in particular, be alert to children who may benefit from Early Help, Family

Help or additional safeguarding support, including a child who:

9.6.1. is disabled and/or has certain health conditions and has specific additional needs;

9.6.2. has special educational needs

9.6.3. has a mental health need;

9.6.4. is a young carer;

9.6.5. is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

9.6.6. is frequently missing/goes missing from education, home or care;

9.6.7. has experienced multiple suspensions, is at risk of permanent exclusion, or is attending Alternative Provision or a Pupil Referral Unit.

9.6.8. is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;

9.6.9. is at risk of being radicalised or exploited;

9.6.10. has a parent or carer in custody, or is affected by parental offending;

9.6.11. is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

9.6.12. is misusing drugs or alcohol themselves;

9.6.13. is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;

9.6.14. is a privately fostered child.

9.7. In the first instance staff should discuss any Early Help or Family Help needs with the Designated Safeguarding Lead.

9.8. The Designated Safeguarding Lead will consider whether concerns would be most appropriately addressed through school-based support, Family Help services, an Early Help Assessment, targeted multi-agency support or a referral to children's social care.

9.9. All staff **must** be aware of the Early Help process which includes identifying an emerging problem, liaising with the Designated Safeguarding Lead, sharing information and in some cases, acting as the

lead professional in undertaking early help assessments.

9.10. If Early Help, Family Help and/or other support is appropriate, the case should be kept under constant review by the identified lead professional under the supervision of the Designated Safeguarding Lead and consideration given to a referral to children's social care if the child or young person's situation doesn't appear to be improving. Details of the local authority's Family Help Hub/Team can be found in the Contacts section (**section 20**) of this policy.

9.11. The Designated Safeguarding Lead will ensure that decisions, actions and outcomes are recorded on CPOMS in accordance with school procedures.

9.12. Schools should be conscious that each local authority can have different procedures and support available around Family Help and Early Help, and that the procedures of the child's home/placing local authority should be followed where a child comes from out of area.

9.13. The school recognises that successful Family Help and Early Help interventions rely upon effective information sharing, professional curiosity, strong relationships with children and families, and timely multi-agency collaboration. The school will actively participate in Family Help, Team Around the Child, Child in Need and Child Protection processes where required.

10. Mental Health

10.1. Research suggests that Autistic children and young people are at increased likelihood to experience mental health concerns such as anxiety and depression.

10.2. Pupils may feel anxious in their day-to-day lives due to navigating social and sensory environments that might be difficult or challenging.

10.3. Research suggests autistic people are more prone to experiencing anxiety and estimates that up to half of all autistic people experience high levels of anxiety on a regular basis.

10.4. School staff need to be alert to all pupils' mental health needs and consider what additional support may be needed.

10.5. School staff need to be alert to changes in a pupil's mental health and be curious as to what may be causing this.

10.6. Staff should be alert to indicators that may suggest a child is experiencing significant mental health difficulties, including self-harm, suicidal thoughts, eating difficulties or eating disorders, significant changes in presentation, withdrawal, risk-taking behaviour, persistent

low mood or unusual anxiety.

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

10.8. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. 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.

10.9. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

10.10. The school recognises that young carers may experience additional pressures and responsibilities that can impact attendance, wellbeing, mental health, educational engagement and safeguarding. Where a child is identified as a young carer, consideration will be given to any additional support that may be required.

10.11. **Any concerns in relation to the mental health of our children and young people should be raised with the DSL, the school's Senior Mental Health lead and in some cases the SENCo also, without delay to ensure children and young people can access the right support at the right time.**

11. Supporting Gender Questioning Children and Young People

11.1. The school recognises that some children and young people may experience uncertainty, distress or questions relating to their gender identity, gender expression or sense of self.

11.2. The school will respond to all children with dignity, respect and compassion and will ensure that any concerns relating to gender identity, gender questioning or gender-related distress are considered in a child-centred and safeguarding-focused manner.

11.3. Staff should be aware that a child sharing information about their gender identity, gender expression or sexuality is not necessarily the same as a request to socially transition.

11.4. **Coming out** may involve a child sharing their thoughts, feelings, experiences or identity with a trusted adult. In these circumstances, staff should listen carefully, respond supportively, avoid making assumptions and consider any safeguarding, wellbeing or support needs that may be present.

11.5. A child who is questioning their gender identity may not necessarily be requesting any change in how they are supported or recognised within school. In such circumstances, information will be managed in accordance with safeguarding, confidentiality and information-sharing requirements. Consideration will be given to whether there is any safeguarding risk that may necessitate the sharing of information.

11.6. **A request to socially transition** may include a child asking to be known by a different name, different pronouns, different gendered terms, changes to records, participation in activities or other changes affecting how they are recognised within the school community. The school recognises that social transition may constitute a significant intervention in a child's life and that decisions relating to social transition should be approached carefully, with consideration of safeguarding, wellbeing, parental involvement and the potential impact upon the child. Requests regarding changes to names, pronouns or forms of address will be considered on an individual basis, taking account of the child's wishes and feelings, safeguarding considerations and the views of parents/carers. Parents/carers will normally be involved as a matter of priority unless doing so would place the child at risk of harm.

11.7. Particular care will be taken when considering requests relating to social transition from primary-aged children.

11.8. Some children may already be **living in stealth**, meaning that they are presenting in a gender different from their sex recorded at birth and do not wish others to know that they are transgender or gender questioning. Staff should be mindful that inadvertent disclosure of sensitive information may cause distress and increase vulnerability to bullying, harassment, discrimination or social isolation. Information relating to a child's personal circumstances should only be shared on a need-to-know basis and in accordance with safeguarding, confidentiality and information-sharing requirements. Staff should avoid making assumptions regarding a child's circumstances and should take particular care not to disclose information that could unintentionally reveal a child is living in stealth.

11.9. Where a child is living in stealth, staff should take particular care to ensure that decisions relating to toilets, changing facilities, residential visits, overnight stays and record keeping are discussed with the Designated Safeguarding Lead at the earliest opportunity, so that appropriate safeguarding and support arrangements can be considered.

11.10. Where a child expresses a wish to socially transition, or where staff become aware that a child is living in stealth, staff must inform the Designated Safeguarding Lead and record the conversation on CPOMS in accordance with school procedures. The Designated Safeguarding Lead will consider:

- the child's wishes and feelings;
- the child's age, maturity and developmental stage;
- any safeguarding or welfare concerns;
- the child's mental health and emotional wellbeing;
- any additional vulnerabilities, including SEND;
- whether the child may be at risk of bullying, harassment, abuse, exploitation or social isolation;
- the views of parents/carers, unless doing so would place the child at risk of harm;
- advice from relevant professionals where appropriate;
- Any known wishes and views previously expressed by the child;

- whether any proposed arrangements are sustainable, practical, and proportionate within the school environment; and
- the best interests, welfare and support needs of the child.

11.11. Staff should not promise confidentiality and should explain that information may need to be shared with appropriate safeguarding staff where this is necessary to protect the welfare of the child or others. Staff should not make commitments regarding social transition, changes to names, pronouns or forms of address, disclose information about a child's gender identity to other pupils or adults, or make changes to school records without consultation with the Designated Safeguarding Lead and consideration of safeguarding, welfare and information-sharing requirements.

11.12. The school will maintain accurate records in accordance with legal requirements and statutory guidance. Where a child's biological sex is recorded, this will be recorded accurately. Any additional information relating to a child's preferred name, form of address or other support arrangements will be managed separately, as appropriate, and in accordance with safeguarding, information-sharing and data protection requirements.

11.13. The school recognises that gender questioning children and young people, including those who are socially transitioning or living in stealth, may be at increased risk of:

- bullying;
- discrimination;
- social isolation;
- online abuse;
- exploitation;
- self-harm;
- anxiety and other mental health difficulties.
- Any safeguarding concerns relating to a gender questioning child will be responded to in accordance with this policy. The welfare of the child will always remain the paramount consideration.

11.14. **Single-Sex Spaces and Facilities**

11.14.1. The school recognises its duties to safeguard all children and to provide appropriate privacy, dignity and safety when using toilets, changing facilities, showers, residential accommodation and other single-sex spaces.

11.14.2. In accordance with *Keeping Children Safe in Education 2026* and other relevant statutory guidance, the school will provide single-sex toilets, changing facilities, showers, overnight accommodation and other single-sex spaces based on biological sex. The school will consider individual safeguarding and welfare needs when determining appropriate arrangements for gender questioning children and young people.

11.14.3. Where a gender questioning child or young person expresses discomfort or does not wish to use sex-designated facilities, the school will consider whether suitable alternative arrangements can be provided. Such arrangements will be considered on a case-by-case basis and may include:

- access to a self-contained individual toilet;
- access to a single-occupancy changing space;
- separate changing arrangements;
- alternative timings for access to facilities;
- other reasonable arrangements that support the child whilst maintaining privacy, dignity, safety and safeguarding for all children.

11.14.4. Any agreed arrangements should form part of the child's individual support plan and, where appropriate, safeguarding and wellbeing risk assessment.

11.14.5. The school will not permit a child to use toilets, changing facilities, showers, overnight accommodation or other single-sex spaces designated for the opposite biological sex. Decisions regarding any alternative arrangements will be considered within the school's safeguarding procedures and in accordance with statutory guidance.

11.14.6. Participation in school sport will be managed in accordance with safeguarding, health and safety, equality and relevant statutory guidance. Where sporting activities are organised on a single-sex basis, participation arrangements will be determined with reference to biological sex, the safety and welfare of participants, the nature of the activity and the need to ensure fair and appropriate competition. The school will consider individual safeguarding and welfare needs and, where appropriate, alternative arrangements to support participation.

11.14.7. When considering requests relating to social transition, living in stealth or access to facilities, the school will:

- place the welfare and best interests of the child at the centre of decision-making;
- consider the rights, privacy, dignity and safety of all children affected by the decision;
- consider the child's wishes and feelings;
- involve parents/carers unless doing so would place the child at risk of harm;
- seek advice from relevant professionals where appropriate;
- maintain accurate records of decisions and reviews; and
- ensure that safeguarding considerations remain paramount at all times.

11.15. **Risk Assessment and Individual Support Planning**

11.15.1. Where a child is gender questioning, requests social transition within school, or is known to be living in stealth, the Designated Safeguarding Lead will consider whether an individual safeguarding and wellbeing risk assessment is required.

11.15.2. Any assessment will be child-centred and will consider:

- the wishes and feelings of the child;
- the child's age, understanding and developmental stage;
- safeguarding and welfare concerns;
- mental health and emotional wellbeing;
- vulnerabilities associated with SEND or disability;
- risks of bullying, discrimination, harassment or victimisation;
- online risks and exposure to harmful content;
- parental involvement and support, unless doing so would place the child at risk of harm;
- access to toilets, changing facilities, residential visits and other single-sex spaces;
- participation in educational visits, overnight stays and wider school activities;
- confidentiality and information-sharing considerations;
- the impact upon other children;
- advice from relevant professionals where appropriate.

11.15.3. Any agreed support arrangements will be recorded, reviewed regularly (at least termly) and amended where circumstances change. The welfare of the child will remain the paramount consideration at all times.

11.15.4. Where appropriate, the Designated Safeguarding Lead may convene review meetings involving the child, parents/carers, relevant school staff and external professionals to ensure that support arrangements remain suitable, proportionate and effective.

12. Dealing with Allegations Against Staff, Trustees and Volunteers

12.1. The school has procedures for dealing with allegations against staff (including trainee teachers and agency/supply staff), Trustees and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff (including agency/supply), Trustees and volunteers from false or unfounded allegations. **These procedures are set out in Appendix 3** and follow the DfE guidance found in Part 4 of *Keeping Children Safe in Education 2026*.

12.2. The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s) also known as LADO).

12.3. The designated officer(s)/LADO **must** be informed immediately and in any event within one working day of all allegations against staff (including supply), Trustees and volunteers that come to the school's attention and meet the criteria set out in paragraph 1 of **Appendix 3**.

12.4. **Any allegation against staff must be reported into the allegations database and alerted to the LAT Director of Safeguarding and Central HR.**

12.5. Detailed guidance is given to staff, Trustees and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct.

13. Child-on-Child Abuse, Harmful Sexual Behaviour (HSB), Sexual Harassment and Sexual Violence

13.1. This section should be read in conjunction with the LAT Anti-Bullying Policy. The school adopts a whole-school approach to preventing, identifying and responding to child-on-child abuse, harmful sexual behaviour (HSB), sexual harassment and sexual violence.

13.2. For the purposes of this policy, our language replicates that used in *Keeping Children Safe in Education 2026*:

> 13.2.1. 'We, *in places, use the term 'victim'. It is a widely recognised and understood term. It is important that staff recognise that not everyone who has been subjected to*

abuse considers themselves a victim or would want to be described in this way.

13.2.2. *Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the child is most comfortable.*

13.2.3. *We, in places, use the term 'alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. These are widely used and recognised terms and the most appropriate to aid effective drafting of policies and guidance.*

13.2.4. *However, staff should think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.*

13.3. Staff may prefer to use the terms, *'child who has been harmed' and 'child who may have caused harm.'*

13.4. Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It can happen both inside and outside of school and online. Incidents may occur between pupils during the school day, whilst travelling to and from school, during extracurricular activities, within residential settings, through social media, gaming platforms, messaging services or other online environments. Child-on-child abuse may also involve the creation, possession or sharing of AI-generated or digitally manipulated images, including deepfakes and deep-nudes. Such behaviour may be used to humiliate, coerce, blackmail, exploit, threaten or abuse others and will be treated as a safeguarding concern and managed in line with this policy and relevant statutory guidance.

13.5. The school recognises that Harmful Sexual Behaviour (HSB) exists on a continuum from inappropriate behaviour through to abusive and violent behaviour. Responses will be proportionate, educational and safeguarding-focused, taking account of the age, developmental stage, understanding and needs of the children involved, whilst ensuring that all children are protected from harm and appropriately supported. The school will consider the context of the behaviour, the nature of the incident and the needs of all children involved when determining an appropriate response.

13.6. Online forms of child-on-child abuse may include abusive messaging, sexual harassment, sharing of images without consent, coercion, online intimidation, exclusion, impersonation, deepfake content and other technology-assisted forms of abuse. Such behaviours may occur through social media platforms, gaming environments, livestreaming

services, messaging applications and emerging technologies, including artificial intelligence tools.

13.7. It is important that all staff recognise the indicators and signs of child-on-child abuse, harmful sexual behaviour (HSB), sexual harassment and sexual violence, and understand how to identify concerns and respond appropriately to reports (see **Appendix 2**).

13.8. Staff should maintain an attitude of *"it could happen here"* when considering reports, concerns and indicators of child-on-child abuse, harmful sexual behaviour (HSB), sexual harassment and sexual violence. Staff should remain professionally curious and be alert to the possibility that a child may not make a direct disclosure.

13.9. All pupils are to be reassured that any allegations of abuse will be taken seriously and that they will be supported and kept safe. Victims **must never** be given the impression that they are creating a problem or made to feel ashamed for making a report. The wishes, feelings and lived experiences of the child who has been harmed will be carefully considered when determining appropriate support and safeguarding measures.

13.10. With regard to child-on-child sexual abuse, whilst statistically it is reported that it is more likely that girls may be victims and boys' perpetrators, this should not cloud staff judgement, all child-on-child abuse is unacceptable and will be taken seriously.

13.11. Staff must be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation and hazing type violence with respect to males. Whilst being mindful, these behaviours may happen to any child of any gender.

13.12. All pupils can raise concerns regarding child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence with any trusted adult, including the Designated Safeguarding Lead, Deputy DSLs, their key worker or through established reporting mechanisms such as worry boxes.

13.13. It is important to acknowledge that pupils may not be able to share concerns about child-on-child abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the child may never make a direct report. Children may feel embarrassed, ashamed, frightened, worried about getting into trouble, concerned about the reaction of adults or fearful of the consequences of reporting. Staff should understand that these barriers may prevent children from making a direct disclosure and should respond sensitively to any indicators of abuse.

13.14. Where concerns have been raised by anyone regarding child-on-child abuse, children will be enabled to share their feelings in their known preferred communication method with a person they can trust, such as a parent/carer, teacher, relative, friend or advocate.

13.15. It is understood at the school, that even if there are no reports in the school, it does not mean it is not happening. It may be the case that it is just not being reported. As such, if staff have any concerns regarding child-on-child abuse, harmful sexual behaviour, sexual harassment or sexual violence, they must report these concerns immediately to the Designated Safeguarding Lead (or Deputy DSL) and record them on CPOMS in accordance with school procedures.

13.16. At the school we do not tolerate abuse between pupils. All forms of child-on-child abuse are unacceptable and will be taken seriously.

13.17. All staff understand the importance of challenging inappropriate or harmful behaviour between pupils that are inappropriate and/or abusive in nature.

13.17.1. Abuse should also not be excused as part of behaviours associated with their diagnosis.

13.17.2. Downplaying certain behaviours such as misogynistic or misandrist behaviour for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys will be boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and a culture that normalises abuse. This will not be tolerated in the school and may lead to disciplinary action being taken.

13.17.3. The school will address all reports of sexual harassment and harmful sexual behaviour, including behaviours that may appear low-level, as early intervention is essential in preventing escalation and promoting a safe culture.

13.18. Child on child abuse in the form of prejudice-based and discriminatory bullying will not be tolerated, please refer to LAT Anti-Bullying Policy for further guidance.

13.19. All staff are aware that LGBTQ+ children and young people, and those who are perceived by others to be LGBTQ+, may be particularly vulnerable to child-on-child abuse, bullying, harassment and discrimination and may face additional barriers to reporting concerns.

13.20. The school’s response to sexual violence and sexual harassment between pupils of the same gender is equally as robust as it is for incidents between children of different genders.

13.21. The initial response to a report from a child is incredibly important. How staff respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. **See Appendix 2 – Action staff must take for guidance**.

13.22. The school will make decisions on a case-by-case basis, taking account of the wishes of the child who has been harmed, the nature of the incident, the ages and developmental stages of the children involved, and the need to maintain the safety and welfare of all children.

13.23. All allegations regarding child-on-child abuse **must** be reported in accordance with the procedures set out in this policy (see **appendix 2**). All concerns, disclosures, reports and actions taken will be recorded on CPOMS in accordance with school safeguarding procedures.

13.24. The school will consider carefully how best to protect and support all children involved whilst ensuring that education is disrupted as little as possible and only where necessary to safeguard children.

13.25. A pupil against whom an allegation of abuse has been made may need to be subject to safeguarding separation arrangements, as outlined in paragraphs 26-29 of *Suspension and Permanent Exclusion from Maintained Schools, Academies and Pupil Referral Units in England, including Pupil Movement*. In some cases, suspension may also be necessary during an investigation in order to safeguard all children involved. The school's Behaviour Policy and Suspension and Exclusion Policy will apply. Where safeguarding separation and/or suspension is implemented in relation to child-on-child abuse, the LAT Director of Safeguarding must be notified.

13.26. If the allegation is in relation to sexual violence or sexual harassment, guidance set out in *part 5 of Keeping Children Safe in Education 2026* will be followed.

13.27. The school will take advice from children's social care services and police as appropriate, on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

13.28. If the allegation is regarding sexual violence, the police **must** be notified. The DSL must also notify the Director of Safeguarding.

13.29. Where an allegation is made against a pupil, both the child who has been harmed and the child who may have caused harm will be considered potentially vulnerable and appropriate safeguarding procedures in accordance with this Policy will be followed. The school recognises that children who display harmful behaviour may also have unmet safeguarding needs, have experienced trauma, abuse or adverse experiences themselves, and may require assessment, support and

intervention alongside any disciplinary response. See **Appendix 2**.

14. Missing Child and Child Absent from Education Procedures

14.1. Knowing where children are during school hours is an extremely important aspect of safeguarding – refer to **Appendix 4** of this Policy for safeguarding responses to Missing/absent Pupils and LAT Attendance Policy.

14.2. Children's repeated or prolonged absence from school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

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

14.4. Current allocated social workers **must** be consulted on any issues in relation to attendance for the children they are supporting, including immediate notification when the child is absent from education.

14.5. In managing attendance, the following actions represent standard practice:

14.5.1. We always follow up with parents/carers when pupils are not at school. This means the school office team will seek to ensure there are at least two up to date contacts numbers for parents/carers/Emergency contacts. Parents/carers should remember to update the school as soon as possible if the numbers change. Where it has not been possible to obtain two emergency contact numbers, this must be reported to the DSL.

14.5.2. All staff are informed of the schools Missing/absent Pupil Procedure which can be found in **Appendix 4** of this Policy. This procedure is to be used for searching for, and if necessary, reporting, any pupil missing/absent from the school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being absent.

14.6. The school **must** inform the relevant local authority of any pupil who does not attend the school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

14.7. Children who are absent from Education:

14.7.1. The school recognises that autistic children and young people are at increased risk of being absent from education and need appropriate support in place to access school.

14.7.2. The school recognises that a child going missing/absent from education is a potential indicator of abuse or neglect, and will follow guidance from *Annex A, Keeping Children Safe in Education 2026* and *'Children Missing Education' 2024* to promote their safety and wellbeing.

14.7.3. The procedures in this policy will be followed when dealing with children who are absent from education, particularly on repeat occasions or prolonged periods, to help to identify the risk of abuse and neglect and to help prevent the risks of them going missing or being absent in the future.

14.8. Where a child isto be deleted from the pupil roll, the school **must** inform the local authority in which the child resides in the applicable circumstances.

14.9. Where a parent/carer notifies a school that a pupil will live at another address, the office team **must** record in the admissions register:

14.9.1. The full name of the parent/carer with whom the pupil will live;

14.9.2. The new address; and

14.9.3. The date from when it is expected the pupil will live at this address.

14.10. Where a parent/carer of a pupil notifies the school that the pupil is registered at another school or will be attending a different school in future, schools **must** record in the admission register:

14.10.1. The name of the new school; and

14.10.2. The date on which the pupil first attended or is due to start attending the new school.

14.11. Where children leave the school or college (including in year transfers) the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be

obtained.

14.12. Where a parent/carer has expressed their intention to Electively Home Educate their child, in *Keeping Children Safe in Education 2026* it advises that local authorities, schools, and other key professionals should work together to coordinate a meeting with parents/carers and carers where possible, to discuss what support can be put into place to either support the child to remain in school or to discuss next steps.

14.13. This meeting will ensure that parents and carers have considered what is in the best interests of each child. *Keeping Children Safe in Education 2026* emphasises that this is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

14.14. This meeting **must** be arranged by the Principal and any details regarding the meeting and any documentation relating to the request for Elective Home Education (EHE) recorded on CPOMS.

14.15. Where a parent/carer Elects to Home Educate their child:

14.15.1. Parents/carers **must** first seek permission of the local authority to remove the child from the register (which must be obtained before his or her name can be removed from the admission register). If the local authority refuses consent, parents/carers can ask the Secretary of State to settle the dispute.

14.15.2. School will only delete the child's name from their admissions register upon receipt of written notification from both the parents/carers and approval from the local authority, that the pupil is receiving education otherwise than at school. Schools should not wait for parents/carers to give written notification that they are withdrawing their child from school before advising their local authority.

14.15.3. Schools **must** make a return (giving the child's name, address and the ground upon which their name is to be deleted from the register) to the local authority as soon as the ground for deletion is met, and no later than the date in which they delete the pupil's name from the register. They should also copy parents/carers into the notice to the local authority.

14.15.4. See DfE guidance Elective Home Education for more information.

14.16. Alternative Provision

14.16.1. Quality assurance checks **must** be conducted by school on all Alternative Provision accessed by pupils/students, whether this is a Local Authority recommended provision or otherwise.

14.16.2. When placing a child or young person with an alternative provider, the school / service **must** obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

14.16.3. The school remains responsible for a child or young person's welfare during their time at an alternative provider.

14.16.4. This responsibility includes monitoring the continued suitability to meet the student's educational and support needs, attendance and involvement in management of safeguarding concerns where appropriate.

14.17. Work experience

14.17.1. Decisions on work experience placements **must** be discussed and agreed with families and children in advance.

14.17.2. Appropriate transition arrangements **must** be agreed with the provider.

14.17.3. Prior to a child / young person starting work experience, the DSL **must** conduct Safeguarding Quality assurance checks, ensuring that the provider has appropriate safeguarding policies and procedures in place.

14.17.4. The school remains responsible for a child or young person's welfare during their time at a provider.

14.17.5. This responsibility includes monitoring of attendance and involvement in management of safeguarding concerns where appropriate.

15. Informing Parents and Carers

15.1. Parents and carers will normally be kept informed, as appropriate, of any action to be taken under these Safeguarding procedures. However, there may be circumstances when the

Designated Safeguarding Lead will need to consult the Principal, the designated officer (LADO), local authority children's social care services and / or the police before discussing details with parents/carers.

15.2. In relation to Channel referrals, the Designated Safeguarding Lead will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

15.3. In relation to online safety, parents and carers will be informed of the systems that are in place to monitor and filter online content in school, how the school plans to use online material in the curriculum, and who from the school pupils may be interacting with online.

15.4. Where concerns are raised about a pupil's use of the internet or access to online content, parents and carers will be consulted prior to any action being taken such as confiscation of devices.

15.5. Risk assessments of a pupil's needs will be completed in consultation with parents and carers.

15.6. The school will always take a collaborative approach with parents and carers, working together to help keep pupils safe both at school as well as at home and in the community.

15.7. The school will assess and support all families, including consideration of whether support should be offered under the Early Help framework.

15.8. See also **Appendix 3** for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Principal of the school, based on guidance from *Part 4, Keeping Children Safe in Education 2026.*

16. Site Safety and security

16.1. The school will take all practicable steps to ensure that school premises are as secure as circumstances permit and safe for our staff and children.

16.2. Daily checks are conducted by the site team to ensure the site is safe and secure prior to opening each morning.

16.3. All staff / visitors **must** check in with reception and then input their personal details into Inventory, our visitor sign in platform. Their time is logged and the person they are visiting is emailed to say they have arrived and are ready to be picked up from reception. A visitor sticker badge with their name and photo is printed and should be displayed on their person throughout the duration of the visit. On their exit, the visitor **must** sign out, logging the time of exit.

16.4. When the school premises/facilities are hired or rented by an organisation or individual (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), the Designated Safeguarding Lead **must** work alongside the School Business Manager / Site team and Principal to ensure appropriate arrangements are in place to keep children safe.

16.5. External providers'/organisations' own Child Protection policies and procedures should be provided to the school and in liaison with the Designated Safeguarding Lead, agree how and when to report any concerns to the school.

16.6. Safeguarding requirements **must** be documented within any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of premises; and that failure to comply with this would lead to termination of the agreement. Any concerns or allegations regarding those that hire/lease the premises **must** be reported to the school DSL.

16.7. Health and Safety reporting: All staff **must** report incidents, accidents and near misses in accordance with the schools Health and Safety Policy.

16.8. **Personal electronic devices**

16.8.1. In accordance with school expectations and national guidance, the school aims to maintain a mobile phone-free environment during the school day wherever reasonably practicable. Arrangements for pupil access to personal mobile devices during the school day are set out within the Behaviour Policy and Online Safety Policy.

16.8.2. Staff are not permitted to have their mobile phones / similar devices (such as smart watches) turned on, unless they have the express permission of the Principal.

16.8.3. Under no circumstances are photographs or videos to be taken of pupils on a personal device.

16.8.4. Photographs may only be taken of pupils on LAT devices with the express permission of the Principal.

16.8.5. Photographs and videos of the children and young people we support remain the property of the individual and cannot be used externally without the individual/parental/carer permission in writing. LAT Photo Permission forms are available and should be completed by the pupil or parent/carer (as appropriate).

16.8.6. Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. The DPO **must** oversee the planning of any events where photographs and videos will be taken.

16.8.7. Where planned photographs and videos are to involve pupils who are looked after, adopted pupils, or pupils for whom there are security concerns, the Principal **must** liaise with the DSL to determine the steps involved.

16.8.8. The DSL will, in known cases of pupils who are looked after or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents/carers to assess the needs and risks associated with the pupils.

16.8.9. Visitors may not photograph pupils and may only photograph buildings with consent of the school or service.

16.8.10. Staff are not permitted to show any images, videos or communication from their personal mobile phone to pupils as per the Staff code of conduct.

16.8.11. Staff **must** adhere to the Online Safety Policy at all times which includes acceptable use agreements and use of AI.

16.8.12. If permission has been granted by the Principal, the use of approved personal electronic devices, including mobile phones and cameras, by staff and pupils, will be closely monitored in accordance with the Online Safety Policy (including use of Personal Electronic Devices).

16.8.13. Staff **must** report any concerns about pupils' or other staff members' use of personal electronic devices to using the school's reporting procedure.

17.Confidentiality and Information Sharing

17.1. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The school has clear powers to share, hold and use information for these purposes[4].

17.2. Concerns about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern. Staff in school **must** share any safeguarding concern internally to the relevant people (Designated Safeguarding Lead / Principal / LAT Director of Safeguarding) and externally to our safeguarding partners **using secure networks or password protected documents**.

17.3. The school recognises the statutory duty and expectation on practitioners to share information that is necessary to safeguard and promote the welfare of children. In accordance with the Information Sharing Duty under section 16LA of the Children Act 2004, the school will share information with relevant safeguarding partners, agencies and practitioners where that information may help the recipient assess need, understand risk, make decisions, provide support or take action to safeguard and promote the welfare of a child. Staff should recognise that information does not need to be complete, verified or significant in isolation before it is shared. Historical, contextual, partial or pattern-based information may become important when considered alongside information held by other agencies. Information sharing decisions will be timely, proportionate, necessary and lawful

17.4. The school recognises that information sharing should ordinarily take place where the statutory duty applies. Decisions not to share information on the grounds that doing so would be more detrimental to the child than not sharing are expected to be

exceptional. Any such decision must be based on professional judgement and discussed with the Designated Safeguarding Lead

17.5. The school **must** keep all Child Protection and Safeguarding records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. Concerns about consent must not prevent or delay the sharing of information where this is required to safeguard or promote the welfare of a child. Where decisions are made to share or not share safeguarding information, the rationale for the decision, the information shared (or withheld), the individuals involved and any subsequent actions should be recorded within the school's safeguarding recording system (CPOMS)

17.6. The school **must** co-operate with the Local Safeguarding Partnership, Police and local authority children's social care services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the *Children Act 1989* in accordance with the requirements of:

17.6.1. Keeping Children Safe in Education 2026

17.6.2. *Working Together to Safeguard Children 2026*

17.6.3. Prevent Duty Guidance for England and Wales 2024

17.6.4. *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015)*

17.6.5. Information Sharing Duty: Statutory Guidance for Safeguarding Organisations and their Practitioners (DfE, September 2026)

17.7. Where allegations have been made against staff, the school will consult with the local authority designated officer and, where appropriate, the police and local authority children's social care services to agree the information that should be disclosed and to whom.

18. Monitoring

18.1. **Principals and DSLs must** undertake weekly CPOMS 7-day report monitoring to review all incidents recorded, categories

effectively applied and ensuring all actions are recorded and are effective. The **Director of Safeguarding** will conduct termly quality assurance of the 7-day review process with DSL's.

18.2. When monitoring and reviewing concerns, Principals and DSLs **must** ensure that concerns have been appropriately escalated to and acknowledged by internal channels, (such as Near Misses, Health and Safety concerns, Behavioural concerns, and Safeguarding concerns) as well as external agencies.

18.3. Any serious incidents at the school **must** be followed by a Post-Incident analysis, which includes a review of the safeguarding procedures within the school and a prompt report to the local committee. Where an incident involves a member of staff, the designated officer (LADO) will assist in this review to determine whether any improvements can be made to the school's procedures.

18.4. In addition, the Designated Safeguarding Lead will monitor the operation of this policy and its procedures and will make an annual report to the local committee.

18.5. The annual safeguarding audit, conducted by the Director of Safeguarding alongside the Designated Safeguarding Lead, will include consideration of:

- Family Help, Early Help and multi-agency working arrangements;
- online safety, filtering and monitoring effectiveness;
- safeguarding risks associated with artificial intelligence (AI), deepfakes and emerging technologies;
- child-on-child abuse, harmful sexual behaviour and sexual violence trends;
- attendance, children absent from education and elective home education trends;
- safeguarding vulnerabilities associated with SEND, disability and protected characteristics;
- safeguarding training compliance and workforce development;
- safeguarding culture, including staff confidence in reporting concerns, professional curiosity and speaking up
- the quality and effectiveness of safeguarding recording, decision-making, referrals and learning from incidents.

18.6. Trustees will undertake an annual review of this policy and its procedures and of the efficiency with which the relevant duties have been discharged.

18.7. Trustees will ensure that any deficiencies or weaknesses in regards to child protection and Safeguarding arrangements are remedied without delay.

19. Equality Impact Assessment

19.1. In accordance with the Equality Act (2010) and in supporting those of protected characteristics, school employees and volunteers **must not** discriminate against any person on the grounds of race, nationality, age, religious or similar philosophical beliefs, sexual orientation, or social standing.

19.2. School employees and volunteers **must** work in such an equitable manner, offering equal opportunity for each person we support to achieve the maximum benefit and potential, consistent with respecting the dignity and value of fellow human beings.

19.3. In the design of this policy, we have considered the complex inter-relating elements that impact on effective support and safeguarding of autistic children and young people.

19.4. Our implementation of this policy seeks to lessen some of the known inequities that exist in society, including, but not limited to race, disability and gender. Carefully designed provision and support that affords opportunities for people with those protected characteristics to receive equity of access to all aspects of safeguarding provision is the way in which this is achieved.

19.5. The welfare of the child is paramount and everyone's responsibility and all children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

20. Contacts

Designated Safeguarding Lead (DSL) for the school	
Name	David Ritchie
Email Address	David.Ritchie@vanguardschool.org.uk
Telephone Number	0208 0596 310 ext. 3714

Deputy Designated Safeguarding Lead	
Name	Amy McLelland
Email Address	Amy.McLelland@vanguardschool.org.uk
Telephone Number	0208 0596 310 ext. 3706

Deputy Designated Safeguarding Lead	
Name	Rachael Clements **(Principal)**
Email Address	Rachael.Clements@vanguardschool.org.uk
Telephone Number	0208 0596 310

Deputy Designated Safeguarding Lead	
Name	Dan Bunker
Email Address	Dan.Bunker@vanguardschool.org.uk
Telephone Number	0208 0596 310 ext. 3737

Deputy Designated Safeguarding Lead	
Name	Jonathan Greene
Email Address	Jonathan.Greene@vanguardschool.org.uk
Telephone Number	0208 0596 310 ext. 3711

LAT Director of Safeguarding	
Name	Nicola Law
Email Address	Nicola.Law@libertytrust.org.uk

LAT Director of Governance and Operations (Trust Lead for H&S and complaints)	
Name	Chris Rossiter
Email Address	Chris.Rossiter@libertytrust.org.uk

The Details of the **Local Authority Designated Officer (LADO)** are as follows:

Local Authority Name	Lambeth
Officer Name	Edward Snelgar
Email Address	LADO@lambeth.gov.uk
Telephone Number	020 7926 4679

The telephone numbers of the Children's Social Care departments are as follows:

Department	**Contact Telephone Number**	**Contact Email**
Main referral (MAST/MASH/Front Door)	0207 9263 100	helpandprotection@lambeth.gov.uk
Out of Hours/Emergency Duty Team	0207 9263 100	helpandprotection@lambeth.gov.uk
Early Help / Family Help	0207 9263 100	helpandprotection@lambeth.gov.uk

The telephone numbers of relevant **Prevent** partners are as follows:

Channel Local Authority Chair	
Name	Lydia Nixon
Email Address	LNixon@lambeth.gov.uk
Telephone Number	0207 9263 668

The following telephone numbers may be useful for pupils/staff:

School Principal	
Name	Rachael Clements
Email Address	Rachael.Clements@vanguardschool.org.uk
Telephone Number	0208 0596 310

Chair of Local Committee	
Name	Twanle Kallon
Email Address	Twanle.Kallon@vanguardschool.org.uk
Telephone Number	0208 0596 310

Designated Teacher for Looked After or previously Looked After Children (1)	
Name	David Ritchie
Email Address	David.Ritchie@vangaurdschool.org.uk
Telephone Number	0208 0596 310 ext. 3714

Designated Teacher for Looked After or previously Looked After Children (2)	
Name	Lucie Polya
Email Address	Lucie.Polya@vanguardschool.org.uk
Telephone Number	0208 0596 310 ext. 3718

Mental Health Lead	
Name	David Ritchie
Email Address	David.Ritchie@vanguardschool.org.uk
Telephone Number	0208 0596 310 ext. 3714

Other Useful Contacts	
NSPCC Childline	0800 1111
NSPCC	0808 800 5000 (help@nspcc.org.uk)
Ofsted's Whistleblower Hotline	0300 123 3155
NSPCC Whistleblowing Helpline	0800 028 0285
NSPCC FGM Helpline	0800 028 3550
NSPCC Gangs Helpline	0808 800 5000
Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk Monday to Friday, 9am to 5pm Out of hours: 020 7008 1500 (ask for the Global Response Centre)

21. Appendix 1 - Role of the Designated Safeguarding Lead

21.1. The main responsibilities of the Designated Safeguarding Lead are outlined on full within *Annex B Keeping Children Safe in Education 2026* and summarised below:

21.1.1. To be the first point of contact for parents/carers, pupils, teaching and non-teaching staff and external agencies in all matters of safeguarding and child protection;

21.1.2. To co-ordinate the safeguarding and child protection procedures in the school;

21.1.3. To advise and act upon all suspicion, belief and evidence of abuse reported to them;

21.1.4. To encourage a culture of listening to children, being alert to the different ways autistic children may communicate their concerns, wishes and feelings;

21.1.5. To liaise with and manage referrals to all relevant agencies in a timely manner and where necessary: Referring to social care or supporting staff who make referrals; To Channel programme where there is a radicalisation concern; Where a person is dismissed or left due to risk/harm to a child, referring to the Disclosure and Barring Service and Teaching Regulation Agency (TRA) as required;Where a crime may have been committed to the Police. See NPCC When to call the Police guidance.

21.1.6. To oversee compliance with the Information Sharing Duty under section 16LA of the Children Act 2004, ensuring that safeguarding information is shared appropriately with relevant agencies where it may help them assess need, understand risk, make decisions, provide support or take action to safeguard and promote the welfare of a child, and that decisions to share or not share information are appropriately recorded.

21.1.7. To ensure that all members of staff and volunteers receive training of appropriate frequency and content relating to safeguarding (including online safety, filtering and monitoring systems and appropriate use of AI), child protection and safer recruitment procedure, including induction for those staff who start at different points of the school year, and to keep and maintain records of this training;

21.1.8. To ensure the school's Child Protection policies are known, understood and used appropriately by all staff;

21.1.9. To ensure the school's Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly;

21.1.10. To ensure the School's Child Protection policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;

21.1.11. To liaise with the Local Authority Designated Officer (LADO), the local authority children's social care services and other external agencies on behalf of the school;

21.1.12. Keep the Principal informed of all actions unless the Principal is the subject of a complaint (see **Appendix 3** for the procedures for dealing with allegations against staff);

21.1.13. To monitor the keeping, confidentiality and storage of records in relation to child protection;

21.1.14. To monitor records of pupils in the school who are subject to a Child Protection plan/Child in Need Plan to ensure that this is maintained and updated as notification is received;

21.1.15. To liaise with other professionals to ensure that children who are subject to Child Protection plans are monitored and to take part in Child Protection conferences or reviews.

21.1.16. To ensure the secure transfer of the Child Protection file when a child leaves the school (including in-year transfers). The Child Protection file should be transferred to the new school or college as soon as possible, and within 5 days of an in-year transfer or within the first 5 days of the start of a new term. A clear and proportionate safeguarding transfer summary should accompany the file, outlining current safeguarding concerns, risks, protective factors, involvement of other agencies, current plans and any actions requiring follow-up by the receiving school or college. Where safeguarding information received from another setting or agency is unclear, incomplete or insufficient to support effective safeguarding planning, the Designated Safeguarding Lead should proactively seek clarification and additional information from the originating organisation without delay.

21.1.17. To liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.

21.1.18. To understand and recognise the additional risks that children with special educational needs and disabilities (SEND) can face, including online.

21.1.19. To promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

21.1.20. To be aware of non-statutory guidance *Keeping Children Safe in Out-Of-School Settings, which* details the safeguarding arrangements that schools and colleges should expect providers [hirers] to have in place.

21.1.21. To work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:

- ensure that the school or college knows who its cohort of children who have or have previously had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,

- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have previously had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

21.1.22. To maintain an awareness of emerging safeguarding themes including Harmful Sexual Behaviour (HSB), artificial intelligence, deepfakes, synthetic media, online exploitation and technology-facilitated abuse and ensure these are reflected within safeguarding policy, practice and staff training.

21.1.23. In accordance with the *Prevent Duty Guidance for England and Wales,* the Designated Safeguarding Lead has, in addition, the following responsibilities:

- Acting as the first point of contact for parents/carers, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
- Coordinating Prevent duty procedures in the school;
- Liaising with local Prevent coordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;
- Undergoing Prevent or other appropriate training;
- Maintaining on-going training programme for all school employees including induction training for all new employees and keeping records of staff training; and
- Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

21.2 The Deputy Designated Safeguarding Lead will carry out this role where the Designated Safeguarding Lead is unavailable. The ultimate lead responsibility for Safeguarding and Child Protection remains with the Designated Safeguarding Lead and cannot be delegated.

22.Appendix 2 - Types and Signs of Abuse and Neglect

22.1 Types of abuse and Neglect. All school and college 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

Abuse: 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. Children may be abused by an adult or adults or by another child or children. Part one of *Keeping children safe in education 2026* defines the following types of abuse

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

22.2 Specific Safeguarding issues. Annex A of *Keeping Children safe in Education 2026* contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children are expected to read both Annex A and part one of KCSIE alongside this policy at least annually.

Annex A details specific safeguarding issues such as:

- Child abduction and community safety incidents

- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines
- Children and the court system
- Children who are absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalisation, The Prevent duty and Channel
- Sexual violence and sexual harassment between children in schools and colleges
- Serious Violence
- So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)
- FGM mandatory reporting duty for teachers

22.2.1 Training must incorporate opportunities for staff to understand how to recognise and respond to the wide range of issues.

22.2.2 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing or having repeated or prolonged absences from education and consensual or non-consensual sharing of nudes or semi-nude images or videos put children in danger.

22.2.3 All staff should be aware that safeguarding issues can manifest themselves via Child-on-Child abuse.

22.2.4 Contextual Safeguarding: All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families/home.

Staff should be aware that incidents of **serious violence**, exploitation and criminal activity may occur immediately before the start of the school day, immediately after the end of the school day, whilst travelling to and from school, and during unstructured times. The school will consider these contextual safeguarding risks when assessing concerns and planning interventions.

Extra-familial harms or 'risks outside of the home', take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

22.2.5 Domestic Abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young alleged perpetrators should be offered support.

22.2.6 Child sexual exploitation (CSE): is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

Indicators of child sexual exploitation may include:

- Appearing with unexplained gifts, money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours;
- Self-harm or significant changes in emotional well-being.

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

- Having a prior experience of neglect, physical and/or sexual abuse;

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

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

22.2.7 Child Criminal Exploitation (CCE) and County Lines:

22.2.7.1 CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

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

22.2.7.3 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

22.2.7.4 One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

22.2.7.5 Some additional indicators that may be present when a child is criminally exploited through county lines are children who:

- Go missing and are found in areas away from their home;
- Have been the victim or perpetrator of serious violence (e.g Knife crime);
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- Are found in accommodation that they have no connection with, often called a 'trap house' or

'cuckooing' or hotel room where there is drug activity;
- Owe a 'debt bond' to their exploiters;
- Have their bank accounts used to facilitate drug dealing.

22.2.7.6 Like other forms of abuse, CCE and county lines:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

22.2.8 Female genital mutilation (FGM): FGM refers to procedure that intentionally alter or cause injury to the female genital organs for non-medical reasons. This practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

22.2.8.1 Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

22.2.8.2 Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

22.2.8.3. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

22.2.8.4 Risk factors for FGM include:

- Low level of integration into UK society;
- Mother or a sister who has undergone FGM;
- Girls who are withdrawn from PSHE;
- Visiting female elder from the country of origin;
- Being taken on a long holiday to the country of origin;
- Talk about a 'special' procedure to become a woman.

22.2.8.5 Signs of FGM: FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents/carers wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents/carers who wish to withdraw their children from learning about FGM. Indications that FGM may have already taken place may include:

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

22.2.8.6 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is called the FGM mandatory reporting duty.

Those failing to report such cases will face disciplinary sanctions.

22.2.8.7 It will be rare for teachers to see visual evidence, and they should not be examining pupils. This mandatory reporting duty commenced in October 2015.

22.2.8.8 Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Designated Safeguarding Lead and involve children's social care as appropriate. All staff will utilise *Appendix 3 of Female Genital Mutilation Guidance for Schools July 2019 to ensure appropriate action is taken and conversations are recorded appropriately/in line with Guidance.*

22.2.9 Honour Based Abuse: So-called 'honour-based' Abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

22.2.10 Child on child abuse (including harassment and violence): All staff should be aware safeguarding issues can manifest themselves via child on child abuse.

This is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include online 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 an/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which

may be standalone or part of a broader pattern of abuse;

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- gender-based violence
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

22.2.10.1 Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

22.2.10.2 We believe that all children and young people have a right to attend school and learn in a safe environment. Children and young people should be free from harm by adults in the school and other pupils.

22.2.10.3 We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

22.2.10.4 All allegations of Child-on-child abuse should be reported **immediately** to the DSL. The DSL will consider the need for agency involvement which may include Police and or Social care depending on the allegation – see appendix 2 points 4 & 5.

22.2.10.5 The DSL will be mindful of support and supervision needs of both the victim and the alleged perpetrator, this will

be discussed in consultation with the Principal and in line with *Part 5 of Keeping Children Safe in Education 2026*.

22.2.10.6 Making, creating, possessing, viewing or sharing nudes and semi-nudes, whether consensual or non-consensual - Images may be self-generated, created by another individual, digitally altered or wholly generated through artificial intelligence technologies, including deepfakes and synthetic media. The school will adopt a safeguarding response to all incidents involving the making or sharing of nudes and semi-nudes, regardless of whether the behaviour appears consensual.

We follow guidance given to schools and colleges by the UKCIS Education group *Sharing nudes and semi-nudes: Advice for Education settings December 2024* which outlines the steps to be taken – see part 4 and 5 of this Appendix.

An immediate referral to police and/or children's social care through the MASH or equivalent should be made if at this initial stage:

- The incident involves an adult.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent (see section 1.6 of *UKCIS Sharing nudes and semi nudes: Advice for Education* for guidance on assessing behaviour).
- The images involves sexual acts and any pupil in the images or videos is under 13 .
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

22.2.10.7 Upskirting: typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge**,** with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim. It is a criminal

offence under the *Voyeurism (Offences) Act 2019,* commonly referred to as the Upskirting Act. **Any reports of Upskirting will be reported to the DSL. The DSL will report the offence immediately to the Police and follow guidance as stated in this Policy.**

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

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

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

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

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

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

22.2.11.6 On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered

22.2.12 Medical Needs and Safeguarding

Children with medical conditions, disabilities and additional health needs may be particularly vulnerable where their health, safety or wellbeing needs are not being appropriately met.

Staff should be alert to concerns that a child may be experiencing neglect or be at risk of harm because relevant medical information has not been provided to the school, medical advice is not being followed, necessary treatment is being withheld, or the child is repeatedly sent to school without essential medication, equipment or support required to manage a known medical condition.

Where such concerns are identified, they must be reported to the Designated Safeguarding Lead without delay. The Designated Safeguarding Lead will consider whether the concerns indicate that the child may be suffering or likely to suffer harm and whether a referral to children's social care is required.

The school will work with parents/carers, health professionals and safeguarding partners, where appropriate, to ensure that children receive the support necessary to safeguard their health, wellbeing and access to education.

22.2.13 Online safety: see Liberty schools Online Safety Policy for guidance on whole school approach to Online safety which includes: Online safety coverage in the curriculum; Acceptable Use of technology; filtering and monitoring systems in place to support safe use of technology; Appropriate use of Artificial intelligence (AI) within school and how content, contact, conduct and commerce are monitored.

Staff should be aware that safeguarding concerns may involve AI-generated or digitally manipulated imagery, including deepfakes and deep-nudes. These may be used to humiliate, coerce, blackmail, exploit or abuse children and young people. Concerns involving such content should be responded to in the same way as other forms of harmful sexual behaviour, child-on-child abuse and online abuse and reported immediately to the Designated Safeguarding Lead.

All online safety concerns (including online child on child abuse) must be reported to the DSL and recorded on CPOMS.

22.2.13.1 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk known as the 4 C's (upon which the Online safety Policy is based):

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users; for example: child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.

Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying;

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. Following consultation with the DSL and Liberty Central IT team, they may decide to report concerns of this nature to the Anti-Phishing Working Group (https://apwg.org/).

22.2.13.2 There are close links between online safety concerns and child on child abuse. Whilst there are risks of online child on child abuse and access to potentially harmful content outside of school, pupils may still have access to mobile and smart devices in school and therefore staff must be alert to this risk and ensure pupils adhere to policy in respect of the use of mobile and smart devices on site.

22.2.13.3 Staff must ensure pupils understand both the risks and potential sanctions of non-compliance in respect of the use of mobile and smart devices, as part of the Online Safety Curriculum and in accordance with the Online Safety Policy (Including Acceptable Use of Technologies) and the Behaviour Policy.

22.2.13.4 Communications with parents and carers should be used to reinforce the importance of children being safe online.

Our school/college uses filtering and monitoring technology to maintain safety on school devices. Parents and carers are to be made aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online to support online safety in the home.

22.2.13.5 As part of the Annual Safeguarding Audit, the school will undertake an annual review of the approach to online safety, inclusive of an annual Risk Assessment which will also review the filtering and monitoring systems that are in place. The annual review will also include consideration of risks arising from artificial intelligence technologies, generative AI tools, deepfakes, synthetic media and emerging online safeguarding issues.

The review will be led by the Director of Safeguarding and Head of IT and undertaken in consultation with the Designated Safeguarding Lead and relevant IT staff. As part of the review, documented checks will be undertaken to ensure that filtering and monitoring systems are operating effectively across all internet-connected devices and in all relevant locations used by pupils and staff. The outcomes of these checks, together with any identified actions, recommendations and improvements, will be formally recorded and reported through the school's governance arrangements.

22.2.13.6 Additional information regarding keeping children safe online (including when they are online at home) is provided in *Part 2 of Keeping Children Safe in Education 2026*.

22.2.14 Signs of abuse. Possible signs of abuse include, but are not limited to:

- The pupil says they has been abused or asks a question or makes a comment which gives rise to that inference;
- There is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
- The pupil's behaviour stands out as either being extremely withdrawn, extremely challenging, or there is a sudden or significant change in the pupil's behaviour;
- The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

- The pupil's development is delayed; the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
- The pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- The pupil is reluctant to go home, or has been openly rejected by their parents or carers.
- Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- The Local Safeguarding partnership can provide advice on the signs of abuse and the DfE advice *What to do if you're worried a child is being abused (2015)* provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

22.2.15 Radicalisation and the Prevent duty. The school has a legal duty to have due regard to the need to prevent individuals from being drawn into terrorism.

21.2.15.1 The school aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. The school is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

21.2.15.2 The school has adopted the Government's updated definitions for the purposes of compliance with the Prevent duty:

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat

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

22.2.15.3 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children and young people's behaviour which could indicate that they may be in need of help or protection.

22.2.15.4 Children and young people at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

22.2.15.5 Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

> There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

22.2.15.6 The school will be sensitive to age and learning appropriate behaviour, though example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists;
- Changing their style of dress or personal appearance to accord with the group;
- Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;

- Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- Attempts to recruit others to the group/cause/ideology;
- Communications with others that suggest identification with a group/cause/ideology.

22.2.15.7 Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- Using insulting or derogatory names or labels for another group;
- Speaking about the imminence of harm from the other group and the importance of action now;
- Expressing attitudes that justify offending on behalf of the group, cause or ideology;
- Condoning or supporting violence or harm towards others; or
- Plotting or conspiring with others.

22.2.15.8 Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

22.3 Guidance for staff and volunteers on suspecting or hearing a disclosure of abuse / Responding to a cause for concern

22.3.1 Action staff must take . A member of staff, agency/supply staff or volunteer suspecting or hearing a disclosure of abuse (including child on child abuse and Online safety concerns):

- Must listen carefully to the child or young person and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;
- Must not ask leading questions, i.e. a question which suggests its own answer;
- Must reassure the child or young person but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to

pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken;

- **Staff are not to view or forward illegal images of a child.**

Staff must keep a sufficient written record of the conversation or concern within CPOMS. This record should be made within 24 hours. The record should include:

- the date and time;
- the location that the conversation or concern took place;
- a clear and comprehensive summary of the concern including the child's voice where possible;
- details of how the concern was followed up and resolved;
- a note of any actions taken, decisions reached and the outcome.
- The CPOMS record must clearly outline those involved using initials for students and full names and roles of professionals and family members.
- The CPOMS record should be factual and not contain the opinion of the staff member.
- The CPOMS record should not contain information relating to staff investigations or suspensions beyond the initial concern relating to the child.

22.3.2 Where a concern is significant, such as regarding injury to pupils or staff, serious incidents, and any external referral, contact should be made directly with appropriate staff such as the Designated Safeguarding Lead, Principal, and central staff such as the Director of Safeguarding. Recording a concern on CPOMS is not a substitute for this reporting process.

22.3.3 If there is an immediate Child Protection matter, staff must inform the Designated Safeguarding Lead (or deputy) verbally, as soon as possible and follow up with a CPOMS log.

22.3.4 If any other forms of evidence are gathered by any other means, for example, scribbled notes, mobile phones containing text messages, clothing or via school computers, these must be safeguarded and preserved and passed directly to the Designated Safeguarding Lead without delay.

22.3.5 All suspicions or disclosures of abuse must be reported to the Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in **Appendix 3** should be followed.

22.3.6 If there is a risk of immediate serious harm to a child or young person a referral should be made to children's social care immediately and Police where required.

22.3.7 Anybody can make a referral. If the child or young person's situation does not appear to be improving, the staff member with concerns should press for re-consideration.

22.3.8 Weekly 7-day report monitoring will be undertaken to review all entries and follow up actions into CPOMS, conducted by the Principal and DSL.

22.4 Action DSL must take <u>in respect of Child on Child abuse</u> .

22.4.1 Reports of child-on-child abuse, particularly sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made. Any decisions are for the Academy to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role, using their professional judgement, and being supported by other agencies, such as children's social care and the police as required.

22.4.2 It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.Abuse that occurs online or outside of the Academy will be treated with equal seriousness.

22.4.3 If possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

22.4.4 The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment.

22.4.5 The DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns – at this point, Risk is to be assessed and referrals to Police and social care considered as necessary.

22.4.5.1 When there has been a report of sexual violence, the DSL (or deputy) will make an immediate risk assessment.

Where appropriate, the risk assessment will consider the need for safeguarding separation arrangements. This may include the removal of children from shared classes, arrangements for social times, educational visits, school transport, arrival and departure times, before and after school activities, and other measures necessary to maintain a reasonable level of physical separation whilst enquiries, investigations or risk management arrangements remain ongoing.

22.4.5.2 Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

22.4.5.3 Risk assessments should be recorded (written or electronic), uploaded to CPOMS and should be kept under review.

Any safeguarding separation arrangements will be proportionate, reviewed regularly and implemented in the best interests of all children involved. Such arrangements should not be regarded as a determination of responsibility or guilt.

The risk assessments should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s);

- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
- consider intra familial harms and any necessary support for siblings following incidents

22.4.6 The DSL and appropriate staff will hold subsequent interviews with the children or young people involved (if appropriate)

22.4.7 Parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm.

22.4.8 A referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

22.4.9 Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

22.4.10 Where there are images or videos of the abuse, **Staff are not to view or forward illegal images of a child.** It may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

22.4.11 The school or should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

22.4.12 The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

22.4.13 Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the school will

consider the need for anonymity and witness support see: Safeguarding Children as Victims and Witnesses | The Crown Prosecution Service (cps.gov.uk).

22.4.14 The DSL will ensure they do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

22.4.15 The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities as part of the risk assessment process and will liaise with agencies accordingly should additional risks arise.

22.4.16 There are four likely scenarios for the school to consider when managing any reports of sexual violence and/or sexual harassment. Any combination of scenarios may need to occur. It will be important in all scenarios that decisions and actions are regularly reviewed and that where necessary relevant policies are updated to reflect lessons learnt. Likely scenarios:

- Manage Internally
- Early Help
- Referral to Children's Social Care
- Reporting to the Police

For further guidance **see part 5 of *Keeping Children Safe in Education 2026.***

23. Appendix 3 - Dealing with Allegations Against Staff, the Principal, Trustees or Volunteers

23.1 The School's procedures for dealing with allegations made against staff will be used where the member of staff (including agency/supply staff), the Principal, a Trustee or volunteer has:

23.1.1 Behaved in a way that has harmed a child, or may have harmed a child or young person;

23.1.2 Possibly committed a criminal offence against or related to a child or young person;

23.1.3 Behaved towards a child / young person or children / young people in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children or young people.

23.1.4 Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

23.2 Any allegations not meeting these criteria (known as the 'Harms Threshold') will be dealt as a 'low level' concern in accordance with section two of *part 4 of Keeping Children safe in Education 2026* and the Local Safeguarding partnership procedures. Advice from the local authority designated officer (LADO) will be sought in borderline cases.

23.3 All allegations must be dealt with as a priority so as to avoid any delay.

23.4 Allegations against a teacher who is no longer teaching and/or any historical allegations will be referred to the LADO and where necessary the police.

23.5 Allegations relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities) are treated in line with usual procedures – the Principal will inform the LADO.

23.6 Reporting an allegation against staff, the Principal, a Trustee or volunteer: **Where an allegation or complaint is made against any member of staff or volunteer who is not the Principal, the matter should be reported immediately to the Principal.**

23.6.1 The Principal should notify LAT Director of Safeguarding.

Before contacting the local authority designated officer (LADO), the Principal, DSL, or an assigned case manager (referred to hereafter as the 'investigating officer') will conduct basic enquiries to help to determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

23.6.2 The 'basic enquiries' should consider:

- Was the individual in the school/at the alleged location at the time stated within the allegation
- Did the individual or could the individual have come into contact with the child as alleged
- Are there any witnesses
- Was there any CCTV

23.6.3 The allegation and details of the basic enquiry will be discussed with the designated officer (LADO), within 24 hours of the allegation being raised. Where appropriate, the Principal will consult and agree the next steps with the Designated Safeguarding Lead and/or an assigned investigating officer. Following consultation, it will be decided if the case will be managed as either: An allegation that meets the harms threshold or an allegation/concern that does not meet harms threshold and will be investigated as a 'Low Level' concern.

23.6.4 Where an allegation or complaint is made against the Principal, the matter should be reported immediately to LAT Director of Safeguarding, without first notifying the Principal. Again, the allegation will be discussed immediately with the local authority designated officer before further action is taken.

23.6.5 Where an allegation is made against any Trustee or School Committee member, the matter should be reported immediately to the LAT Director of Safeguarding.

Where suspension may need to be considered, please refer to HR to undertake a risk assessment.

23.7 Disclosure of information

23.7.1 Where it has been alleged or identified that a child has been harmed, that there may be an immediate risk of harm to a child, or if the situation is an emergency, children's social care and Police should be contacted as appropriate and the DSL must be notified.

23.7.2 Two key aspects to consider when an allegation has been made:

23.7.2.1 Looking after the welfare of the child – The DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described above.

23.7.2.2 Investigating and supporting the person subject to the allegation – the Principal or investigating officer should discuss with the LADO, the nature, content and context of the allegation and agree a course of action.

23.7.3 When to inform the individual of the allegation should be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate local authority children's social care and the Police.

23.7.4 The parents or carers of the child or young person / children or young people involved will be informed of the allegation as soon as possible if they do not already know of it. Key parties will kept informed of the progress and outcome of the case, however, information provided to those parties will be dependent upon and subject to the laws and guidance on confidentiality, data protection and the advice of external agencies.

23.7.5 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

23.7.6 Where the investigating officer is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to children's social care.

23.7.7 Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should advise of the next steps with the investigating officer.

23.7.8 Where the initial discussion with the LADO leads to no further action, the investigating officer and the LADO should:

- Record the decision and justification for it;
- Agree on what information should be put in writing to the individual concerned and by whom.

23.8 Further action to be taken by the School . A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The school will act in accordance with *part 4 of 'Keeping Children Safe in Education' 2026* and the school's employment procedures.

23.8.1 Whilst schools are not the employers of supply teachers/staff, they should ensure all allegations are dealt with properly. The school will work alongside supply agencies and the LADO to ensure all allegations and concerns in respect of supply teachers/staff are fully investigated.

23.8.2 Please refer to HR for further information regarding the investigation process, next steps and potential disciplinary actions.

23.9 Management of Low Level concerns

23.9.1 As part of the whole school approach to safeguarding, the school will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including agency/supply, volunteers and contractors) are dealt with promptly and appropriately.

23.9.10 The term low level concern does not mean that it is insignificant, it means the behaviour towards a child does not meet the harms threshold. However the concern may indicate that the adult/staff member (including agency/supply, volunteer or contractors) may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work,
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

23.9.11 Low level concerns should be reported to the Principal. The Principal may delegate to the DSL, where appropriate, to investigate low level concerns. Where a low level concern is raised about the Principal, it should be raised with the LAT Director of Safeguarding.

23.9.12 The Principal will confidentially record all low level concerns, the context in which they arose and action taken. The Principal will record the name of the individual who raised the low level concern unless they wish to remain anonymous then this should be respected as far as reasonably possible. Should the matter require further investigation, the identity of the reporter may need to be shared as part of an investigation with the investigating officer. See part 5 of LAT Whistleblowing Policy.

23.9.12.1 The Principal should collect as much information as possible by:

- speaking directly with the person who raised the concern;
- to the individual involved and any witnesses;
- review any documentation or additional information as necessary.

23.9.13 Low level concern records should be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. This may then need raising with LADO, should further concerns arise.

23.9.14 For further guidance regarding Low Level concerns, please speak with **HR and/or LAT Director of Safeguarding.**

23.10 Ceasing to use staff

23.10.1 If the school ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children or young people, a settlement/compromise agreement **will not be used** and there will be a prompt and detailed report to the Designated officer (LADO), Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA). Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the local committee without delay.

23.10.2 If a member of staff (or volunteer) tenders their resignation, or ceases to provide their services, any allegations will still be followed up by the school in accordance with this policy and a prompt and detailed report will be made to the local authority designated officer (LADO) and where necessary to the Disclosure and Barring Service and TRA.

23.10.3 Where a teacher has been dismissed, or would have been dismissed had they not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) is required.

23.10.4 In the case of any Early Years and Foundation Stage provision at the school:

23.10.4.1 The School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of any Early Years and Foundation Stage provision (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and

will provide details of the action taken in respect of those allegations.

23.10.4.2 These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

23.11 Unsubstantiated, false, or malicious allegations

23.11.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's behaviour policy.

23.11.2 Whether or not the person making the allegation is a pupil or a parent/carer (or other member of the public), the school reserves the right to contact the police to determine whether any action might be appropriate.

23.12 Record keeping

23.12.1 Details of allegations found to be malicious will be removed from personnel records.

23.12.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.

23.12.3 An allegation proven to be unsubstantiated, unfounded or malicious will not be referred to in employer references. In accordance with *part 4, 'Keeping Children Safe in Education 2026'*, history of repeated concerns or allegations which have all been found to be false, unsubstantiated, or malicious will also not be included in any reference.

23.12.4 The school will retain all safeguarding records and relevant personnel records for so long as reasonably required[5]. The school will ensure that all records are created, retained, shared and destroyed in accordance with the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.

23.12.5 Further details can be found in the Data Protection policy and procedure.

24.Appendix 4 - Missing / Absent Pupil Procedures

24.1 In the event of a member of staff fearing that a student has gone missing whilst at school:

24.4.1 The member of staff who has noticed the missing child will inform the Principal and Designated Safeguarding Lead immediately.

24.4.1.1 The office staff need to be informed as they will act as a point of contact for receiving information about the search for the missing student.

24.4.1.2 Whilst a member of staff stays with the rest of the class, all other available members of staff will conduct a thorough search of the school premises as directed by the Principal/DSL.

24.4.1.3 The following areas will systematically be searched: classrooms / learning spaces and quiet rooms, pods, sensory rooms, community room, toilets, playground areas and staff offices.

24.4.1.4 Available staff will begin a search of the area immediately outside of the school premises taking a mobile so that they can contact the school office.

24.4.1.5 The search outside school should include: Lambeth Walk Open Space (behind Vanguard School), the surrounding housing estate, Kennington Lane and the local Tesco Express.

24.4.1.6 If the student has not been found after 10 minutes, then parents/carers should be notified.

24.4.1.7 If the parents/carers have had no contact from the student, the police will be contacted by dialling 999. The member of staff will be asked to write an incident form (CPOMS), describing the circumstances which lead to the student leaving the school, when the child was last seen and document the search undertaken. Any medical or Special Educational Needs/ learning needs must be disclosed to police or other agencies.

24.4.1.8 The incident should be relayed to other important agencies: If the student has an allocated Social Worker, then

they should be informed of the disappearance. If the student is a Looked After Child, then the Social Worker should be kept informed.

24.4.1.9 The **LAT Director of Safeguarding** is to be informed once key agencies have been informed.

24.4.1.10 When the student is found, members of staff will care for and talk with the child, bearing in mind that they may be unaware of having done anything wrong or, alternatively, may also have been afraid and distressed and may now be in need of comfort. Other adults present will take the opportunity to speak to the remaining students to ensure that they understand that they must not leave the premises and why. Parents/carers and other agencies will be informed of the outcome of the incident.

24.4.1.11 After the incident, The Principal and DSL will carry out a full investigation taking statements from all the staff present at the time.

24.4.1.12 The **LAT Director of Safeguarding** will conduct 'Post-Incident analysis' with the Principal and DSL. A conclusion is drawn as to how the incident happened and used to inform future Risk Assessments. A written report will be produced and policies and procedures will be reviewed.

24.2 If a pupil goes missing on a school trip:

24.2.1 The Trip leader must ensure the safety of the remaining pupils.

24.2.2 The trip leader/organizer, in discussion with other teaching staff will be responsible for making decisions relating to the trip.

24.2.3 One or more adults should immediately start searching for the missing student.

24.2.4 Regular head counting of pupils should take place, particularly before leaving a venue. Pupils should be readily identifiable, usually by wearing their uniform.

24.2.5 The school must be informed if a student is missing and cannot be found.

24.2.6 If the student has not been found within 10 minutes, the police must be called by dialling 999 and then parents/carers should be informed. If hospitalisation is required TWO staff minimum (1 must be a teacher) must go in the ambulance.

24.2.7 Parents/carers should be notified.

24.2.8 Any medical or Special Educational Needs/ learning needs must be disclosed to police or other agencies.

24.2.9 The incident should be relayed to other important agencies: If the student has an allocated Social Worker, then they should be informed of the disappearance. If the student is a Looked After Child, then the Social Worker should be kept informed.

24.2.10 After any incident of a missing student, CPOMS report must be completed giving full details of how and when the incident occurred.

24.2.11 After the incident, The Principal and DSL will carry out a full investigation taking statements from all the staff present at the time.

24.2.12 The **LAT Director of Safeguarding** will conduct 'Post-Incident reflection' with the Principal and DSL. A conclusion is drawn as to how the incident happened and used to inform future Risk Assessments. A written report will be produced and policies and procedures will be reviewed.

24.3 Children who are absent from education - Key Steps

24.3.1 School to attempt to make contact with parent/carer on Day 1 of absence – if child has a social worker, social worker informed of absence.

24.3.2 No later than Day 3 of absence, if no reason for absence has been obtained, then a home visit must be conducted by school staff to establish pupil's whereabouts.

24.3.3 Within Days 0-10, staff to continue to make efforts to engage the family and locate the pupil: taking record all contact/attempts including telephone calls, texts, emails, letters, home-visits and liaison with professionals who may be involved. School should consider what action is to be taken if it appears likely that the pupil will become a persistent absentee (10% or more of absence). Follow local authority guidance regarding FPN code of conduct and child missing from education guidance.

24.3.4 Whereabouts from day 3 remains unknown

24.3.4.1 Evidence attempts to make contact / locate child /contact with family - **consider referral for police safe and well check**. Consider referral to social care or Early Help if whereabout still not established and no contact made. Referral to local authority child missing from education team no later than day 10 when there is no explanation for absence and above checks have been completed. Detail clearly any safeguarding concerns you may have.

24.3.4.2 DO NOT remove from your roll until child missing from education team has completed initial checks and confirmed that they can be removed.

24.3.5 Whereabouts confirmed to be known but the child remains absent from school

24.3.5.1 Initiate the Attendance protocol and consider if the Child meets the threshold for Early Help, Family Help or Social Care involvement. If a referral is made, evidence the prior actions you have taken.

24.3.5.2 Consider if a home visit is required to ensure the child is safe and well, this can be conducted within the first 10 days of absence, if reason for absence is known (within 3 days if whereabouts is not known).

24.3.5.3 Absence meets the threshold for enforcement action as outlined in *Working Together to Improve Attendance 2026;* Child stays on roll.