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1. Key contacts:..
2. Introduction and Context...
 - 2.1. Our responsibilities...
 - 2.2. Our principles ..
 - 2.3. Scope..
 - 2.4. Our Policy .
3. Safeguarding Roles and Responsibilities..
 - 3.1. All staff, volunteers and governors have responsibility for the following:..
 - 3.2. All academy staff are responsible for:..
 - 3.3. Governors and academy leadership are responsible for:..
 - 3.4. The Designated Safeguarding Lead is responsible for:.
4. Safeguarding Processes and Procedures..
 - 4.1. How to report any concerns..
 - 4.2. Taking Action..
 - 4.3. Children's disclosure of abuse..
 - 4.4. Suspecting that a child is at risk of harm .
 - 4.5. Notifying parents..
 - 4.6. Referral to Children's Social Care..
 - 4.7. Private Fostering ..
 - 4.8. Reporting directly to child protection agencies ..
 - 4.9. Early help..
5. Types of Abuse .
 - 5.1 Child abuse and types of abuse..
 - 5.2 Safeguarding Issues..
 - 5.3 Child Sexual Exploitation and Child Criminal Exploitation – CSE and CCE (see KCSIE 2024 Annex B) .
 - 5.4 Serious Violence .
 - 5.5 CountyLines..
 - 5.6 Honour-Based Abuse(HBA)..
 - 5.7 Female Genital Mutilation .
 - 5.8 Forced Marriage...
 - 5.9 Breast Ironing/Flattening..
 - 5.10 Preventing Radicalisation...
 - 5.11Channel.
 - 5.12 Child on Child Abuse.
 - 5.13 Child on child sexual violence and sexual harassment .
 - 5.14 Responding to reports of sexual violence and sexual harassment .
 - 5.15 Risk Assessment..
 - 5.16 Action following a report of sexual violence and/or sexual harassment..
 - 5.17 Ongoing response – safeguarding and supporting the victim..25
 - 5.18 Academy procedures .
 - 5.19 Domestic Abuse and Children..
 - 5.20 Adolescent to Parent Violent Abuse..
 - 5.21 Digital Safeguarding (also known as-online safety/E-safety).
 - 5.22 Photography and images
 - 5.23 Filtering and monitoring
 - 5.24 Sharing of nudes and semi-nudes .
 - 5.25 Upskirting.

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1
2
3
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80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100

- 5.26 Homelessness..31
- 5.27 Children with Special Educational Needs (SEN) and disabilities .
- 5.28 Mental Health .
- 5.29 Children who are LGBT..
- 6. Attendance ..
- 6.9 Children Missing Education (CME) .
- 6.10 Elective Home Education (EHE) ..
- 6.11 Children with medical conditions who cannot attend school..
- 7. Recruitment of staff and volunteers..
- 8. Dealing with allegations against staff and volunteers which meet the harms threshold..
- 8.9. Concerns or allegations that do not meet the harm threshold/low level concerns .
- 9. T

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2. Our responsibilities

2.1. Our responsibilities

Windsor Academy Trust is committed to safeguarding children, and we expect everyone who works in our academy to share this commitment. This policy sets out how [insert name of academy] will deliver these responsibilities.

2.1.1. This policy must be read in conjunction with the statutory guidance documents 'Keeping children safe in education' (September 2024), 'Working together to safeguard children' (2024), a guide to inter-agency working to safeguard and promote the welfare of Children.

2.1.2. Furthermore, we will follow the procedures set out by the [insert three safeguarding partners in this LA]

2.2. Our principles

2.2.1. We believe that our academy should provide a child-centred, caring, positive, safe and stimulating environment that promotes the emotional, social, physical and moral development of the individual child.

2.2.2. We recognise the importance of providing an environment within our academy that will help children feel safe and

safeguarding is everyone's responsibility: all staff, governors and volunteers should play their full part in keeping children safe; and maintain an attitude of 'it could happen here' and

a child-centred and coordinated approach: a clear understanding of the needs and views of Children.

2.3. Scope

2.3.1. In line with the law, this policy defines a child as anyone under the age of 18 years or any child on roll at this academy.

2.3.2. This policy applies to all members of staff in our academy, including all permanent, temporary and support staff, supply staff, governors, volunteers, contractors and external service or activity providers.

to ensure they receive appropriate safeguarding and child protection training (including digital safeguarding/online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated. In addition to working with the Designated Safeguarding Lead or deputy, staff members should be aware that they may be asked to support social workers to take decisions about individual children.

3.2. All academy staff are responsible for:

knowing who the academy's Designated Safeguarding Lead (DSL) and deputy are
raising any concerns with the Designated Safeguarding Lead and deputy immediately
completing a written safeguarding concern when making a referral. Staff should be clear that this should be done immediately depur



on their safeguarding and child protection responsibilities, including online safety, and procedures to follow if anyone has any concerns about a child's safety or welfare.

ensuring that policies and procedures adopted by the Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.

ensuring that the academy has an appropriate senior member of staff from the academy leadership team, with appropriate status and authority, funding, resources and support to take the lead in responsibility for safeguarding and child protection- the Designated Safeguarding Lead (including online safety and understanding the filtering and monitoring systems and processes in place); and that they receive DSL /level 3 training which is updated every two years.

ensuring that they are aware of and follow local procedures related to safeguarding.

ensuring that they are doing all they reasonably can to limit children's exposure to online harms from the academy's IT system, but that 'over-blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

ensuring that the academy has in place filtering and monitoring, the efficacy of which is regularly monitored and reported on, and which complies with current filtering and monitoring standards.

ensuring that all staff and volunteers undergo safeguarding and child protection training (including online safety, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)

ensuring governors receive appropriate safeguarding and child protection (including online safety which includes an understanding of filtering, monitoring systems and cyber security) training at induction which is updated regularly and at least annually to keep pace with KCSIE updates. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the academy are effective and support the delivery of a robust whole school approach to safeguarding and child protection.

ensuring that they are aware of their obligations under the Human Rights Act 1998, The Equality Act 2010 including The Public Sector Equality Duty, and their local multi agency safeguarding arrangements (see KCSIE 2024 Part 2 The management of safeguarding)

ensuring they have appropriate level of security protection procedures in place in order to safeguard children, staff and systems

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- undertaking relevant training and attending update sessions
- liaising with the principal to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult (PACE code C 2019)
- raising awareness of safeguarding and child protection amongst the staff and parents; and ensuring that child protection information is transferred to the child's new school/academy.
- ensuring that the academy has a robust process in the event of allegations of abuse made against the Head Teacher.
- ensuring all staff receive the appropriate training, and keep it up to date, in line with advice from [insert details of local safeguarding partners]
- notifying the Children's Social Care department if there are concerns over unexplainable and/or persistent absences from education of a child.
- informing the local authority when a



4.4.5. The academy acknowledges that some children can be

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

the academy who



5.1.2. Further information and resources can be found in annexes A, B and part 5 of KCSIE 2024 of this policy – [academy to customise/signpost to academy resources i.e. in CPOMS library or academy intranet etc].

5.1.3. All staff must maintain an attitude of 'it could happen here' and ensure any concern, no matter how small is reported. It could be the vital missing piece of the jigsaw that indicates a child is

manipulated into committing vehicle crime or threatening/committing serious violence to others.

5.3.3 Children can become trapped by this type of exploitation as perpetrators can threaten victims and their families. Staff must recognise that children involved in CCE are vulnerable and are victims themselves and that they may still have been criminally exploited even if the activity appears to have been something they have agreed or consented to

5.3.4 Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

5.3.5 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. It can take place as a one off or over a period of time and may occur online.

5.3.6 It is important that staff recognise that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, staff should be aware that girls are at risk of criminal exploitation too.

5.3.7 Staff must also be aware that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

5.3.8 Staff should be aware that CSE can affect a child who has been coerced into engaging in sexual activities. This includes 16 and 17 year old's who can legally consent to have sex. Some children believe they are in



changes in wellbeing, signs of assault or unexplained injuries.

5.4.2 Unexplained gifts or new possessions are also potential indicators that children have been approached by or are involved with criminal networks or gangs and may be at risk of CCE.

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

5.4.4 Staff will receive training and updates on serious violence and have access to information and resources to support development of their knowledge, skills and Understanding.

5.4.5 Any concerns, no matter how small must be reported using the academy's usual procedures. The DSL or deputy will follow the local authority safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

5.5 County Lines

5.5.1 County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County line activity and the associated violence, drug dealing, and exploitation has a devastating impact on children, vulnerable adults and local communities.

5.5.2 Signs to look out for:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

5.5.3 Where staff have a concern around county lines, they should inform the DSL immediately who will follow the local authority safeguarding procedures. Where there is a risk of imminent harm, an immediate referral to the police should be made.

5.5.4 [Insert local support/contacts for county lines through the safeguarding partners.]

5.6 Honour-Based Abuse (HBA)

5.6.1 So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

5.6.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

5.6.3 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. Where FGM has taken place please refer to section 5.7 of this policy. (see below)

5.7 Female Genital Mutilation

5.7.1 Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

5.7.2 All staff should speak to the DSL or deputy with regard to any concerns about FGM

5.7.3 Teachers should be aware that there is a mandatory legal duty upon them that, if in

5.8.1 A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent

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5.11.1 We understand when it is appropriate to make a referral to the A



harassment, which may be standalone or part of a broader pattern of abuse.
Causing someone to engage in sexual activity without consent.
Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery).
Up skirting – 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.

5.12.7 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. Extra-familial harms 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.

5.13 Child on child sexual violence and sexual harassment

5.13.1 This section of the policy must be read in conjunction with KCSIE.

5.13.2 Sexual violence and sexual harassment can happen anywhere, Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely that it will be perpetrated by boys.

5.13.3 All staff should be aware of

5.14.1 Allegations may be made

5.16 Action following a report of sexual violence and/or sexual harassment.

5.16.1 When a report has been received the DSL or deputy will consider the following:

The wishes of the victim.

The nature of the alleged incident (s) including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed.

The ages of the children involved.

The developmental stages of the children involved.

Any power imbalance between the children.

If the alleged incident is a one off or a sustained pattern of abuse.

That sexual violence and sexual harassment can take place within intimate personal relationships between peers.

If there are any ongoing risks to the victim, other children, or staff.

Intra familial harms.

Support for siblings.


Other related issues and the wider context including links to CSE and CCE.

5.16.2 Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) and any other children involved or im

The needs and wishes of the victim will be paramount.
Consideration of the age and development stage of the victim, nature of the allegations and the potential risk of further abuse.
The victim will never be made to feel they are the problem or made to feel ashamed.
Proportionality of response. Support will be tailored on a case-by-case basis.
A holistic approach with an awareness of health needs associated with sexual assault including physical, mental and sexual health problems and unwanted pregnancy.

5.18 Academy procedures

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sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.

The behavioural responses of children who witness domestic abuse may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in speech, motor or cognitive skills. They may also use violence to express themselves, displaying increased aggression with peers or family. They can become self-injuring.

If a child discloses that they have

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5.22 Photography and images

5.22.1 The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

5.22.2 To protect children, we will:

Seek their consent for photographs to be taken or published (for example, on



5.24.3 We will seek to prevent children from online harms through educating them about the laws and potential consequences of activity online.

5.24.4 Digital safeguarding may be addressed through lessons, specialised digital safeguarding sessions, PHSE, flexi-learning weeks and assemblies.

5.24.5 Many professionals may refer to 'nudes and semi-nudes' as:

youth produced sexual imagery or 'youth involved' sexual imagery. indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.

'sexting'. Many adults may use this term, however some children interpret sexting as 'writing and sharing

will be given. Staff will react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL;
Provide details of sources of support and coping strategies if the child finds themselves in an uncomfortable position such as the Zipit App or ChildLine

5.24.9 When a child has been affected by the sending of an explicit image staff will:

Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious talking about this.
Recognise that they themselves may feel shocked, upset, angry, confused or disappointed while listening to the child.
Give themselves time to process the information, remembering that the child will be watching their reactions.
Reassure the child that they are not alone.
Listen and offer support – they're probably upset and need help and advice, not criticism;
Not shout or make them feel like it's their fault;
Will not ask questions like "why have you done it?" as this may stop them from opening up;
Discuss the problem and the wider pressures that they may face, to help them to understand what's happened and understand any wider safeguarding concerns;
Assure the child that they will do all they can to help and explain that they will seek the support of the DSL
Remind them that they can always talk to Childline or another trusted adult if they are not comfortable talking directly to the staff member.

5.24.10 If a child has shared an explicit image, the DSL or deputy will:

Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
Support the victim to get the images removed by contacting the Internet Watch Foundation.
Assess the situation for wider safeguarding concerns and agree who will be contacted and when then contact parents/police/CEOP/ as appropriate to the case.
Contact the Child Exploitation and Online Protection Centre (CEOP) if the image was requested by an adult, as this is grooming which is illegal.
Contact the DSL at the relevant school if the image was requested by a school aged child not from this academy, to raise awareness of potential wider safeguarding issues or circulation of the image in their school.
All actions and information to be logged on CPOMS.
Parents to be contacted and

to the sender in order to stop future messages. If the child agrees, staff can also help them to block the sender on social media.

the DSL will consult the UKIS sharing nudes and semi nudes advice Sharing nudes and seminudes: how to respond to an incident (publishing.service.gov.uk). if the image was sent by an adult, staff should contact CEOP, the Child Exploitation and Online Protection Centre, as this may be part of the grooming process.

All actions and information to be logged on CPOMS.

Parents to be contacted as appropriate.

5.24.12 Staff must not:

View, copy, print, share, store or save images.

Ask a child to share or download images (if you have already viewed the images by accident, you must report this to the DSL).

Delete the images or ask the child to delete it.

Ask the child/children who are involved in the incident to disclose information regarding the image (this is the DSL's responsibility).

Share information about the incident with other members of staff, the child it involves or their, or other, parents and/or carers.

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5.25.1 Under the Voyeurism (Offences) Act 2019, upskirting is a criminal offence punishable by up to two years in prison. Upskirting' is where someone takes 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. It is a criminal offence. Anyone of any gender, can be a victim.

~~5.25~~ 5.25.2 Any concerns related to upskirting must be reported to the DSL in line

basis. However, it should also be recognised in some cases 16 and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and Support.

5.26.4 Children'



there must be involvement by key professionals who know the child well, including those who have a comprehensive understanding of the child's disability, method of communication, and any associated medical condition.

5.27.5 Schools should consider what specialist advice, guidance and training may be required in order for staff to understand why children with SEND can be more vulnerable to abuse and how to recognise signs of abuse and/or neglect of disabled Children

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5.28.1 All staff should 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.

5.28.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problems. 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 problems or be at risk of developing one.

5.28.3 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. We will ensure that staff are aware of how these children's experiences,can impact on their mental health, behaviour and Education.

5.28.4 We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

5.28.5 We seek to embed positive mental health and mental health awareness through our academy to create a culture where children can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PHSE schemes [Add any further mental health support Strategies].

5.28.6 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the referral mechanisms listed within this policy and speaking to the designated safeguarding lead or a deputy.

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5.29.1 Children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

5.29.2 Staff r L Q R W



going missing in the future.

6.9.4 The academy will ensure compliance with the guidance and regulations contained in the appropriate sections of the Keeping Children Safe in Education (September 2024) document and Working Together to Improve School Attendance (Sept 2022)

6.10 Elective Home Education (EHE)

6.10.1 We will follow the protocols laid out our attendance policy, being mindful that as well as being less visible some of these children are “not in receipt of suitable education”

6.11 Children with medical conditions who cannot attend school

6.11.1 We will follow the protocols laid out our attendance policy

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7.1 The academy will ensure that safer recruitment practices always follow KCSIE and will be adhered to by staff.

7.2 Every interview panel will have at least one member who has a current certificate in safer recruitment. These certificates will be updated every two years. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process including carrying out an online search as part of due diligence on shortlisted candidates.

7.3 As part of our due diligence, we will carry out an online search on shortlisted candidates to help identify, through publicly available information, any incidents or issues which can be explored at interview.

7.4 We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

7.5 We will ensure that any alternative provision facility working with the academy provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.

7.6 Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

7.7 We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.

7.8 The Disclosure and Barring Service (DBS) helps employers make safer

recruitment decisions and prevent



the academy should be taken to the Head Teacher without delay (or where that is not possible, to the designated safeguarding lead); any concerns about the Head Teacher should go to a member of the Executive Team who is nominated to be responsible for liaising with the local authority and other partner agencies.

8.4. If for any reason you cannot make a referral through these routes you have a duty to refer directly to the Local Authority Designated Officer (LADO) whom you can contact here:

[insert contact details]

8.5. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

8.6. Allegations against staff should be reported to the Head Teacher. Allegations against the Head Teacher should be reported to the Designated



9.10. The DSL will ensure the academy maintains accurate records of staff induction and training.

9.11. The DSL will ensure the academy maintains accurate records of staff induction and training.

10.1. Anti-bullying

10.1.1 We hold a comprehensive anti-bullying policy

10.1.2 At this academy we do the following to raise awareness of bullying and what to do about it [insert your strategies for dealing with bullying]

10.1.3 If any child / member of staff / parent / carer has a concern about bullying, they should report it to: [Insert name/s] [Insert job title] or any member of staff.

10.1.4 The DSL will ensure the academy maintains accurate records of staff induction and training.

11.1. Staff should only discuss concerns with the designated safeguarding lead, or Head Teacher or Executive member (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.

11.2. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that anything being released into the public domain does not compromise evidence and safety of the academy. Staff should ensure that any information shared is accurate and up to date.

11.3. Child protection files must be transferred to a new school within 5 days for in year transfers or within the first 5 days of the start of a new term.

11.4 Storage and handling of records

11.4.1 Child protection information will be stored and handled in line with the principles set out in the Data Protection Act 1998 and the GDPR (2018) and the Academy's Data Protection Policy.

11.4.4 Child protection information will be stored separately from the child's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy they will be sent separately from the child's file and under a confidential cover or in an encrypted electronic file.

11.4.5 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the principal or Designated Safeguarding Lead. The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.

11.4.6 We

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12.1. Where the academy premises are hired or rented out the academy leadership will ensure that appropriate arrangements are in place to keep children safe.

12.2. The academy policies will apply where the services or activities are provided by the academy and are under the direct supervision or management of academy staff.

12.3. Where services or activities are provided separately by another body, the governors and academy leadership will seek written assurance that the body concerned has appropriate child protection and safeguarding policies in place (including inspecting these as needed) and ensure that there are arrangements in place to liaise with the academy on these matters where appropriate.

12.4. This applies whether or not the children who attend any of these services or activities are children on the academy roll.

12.5. The academy leadership and governors should also ensure safeguarding arrangements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

12.6. The guidance found in 'Keeping children safe in out-of-school settings' details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

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13.1. The academy will at all times adhere fully to the statutory guidance in place from the Department of Education issued under Section 175 of the Education Act 2002, the Education (Independent Academy Standards) Regulations 2014 and the Education (Non-Maintained Special Academies) (England) Regulations 2011, Current: Keeping children safe in education: Statutory guidance for academies and colleges and the departmental advice: What to do if you are worried a child is being abused – Advice for practitioners (September 2016). Nothing written in this policy overrides the academy's duties under such legislation.

13.2. Board members will oversee the policy, ensure its implementation and review its content on an annual basis.

13.3. The Head Teacher will report on safeguarding activity and progress

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