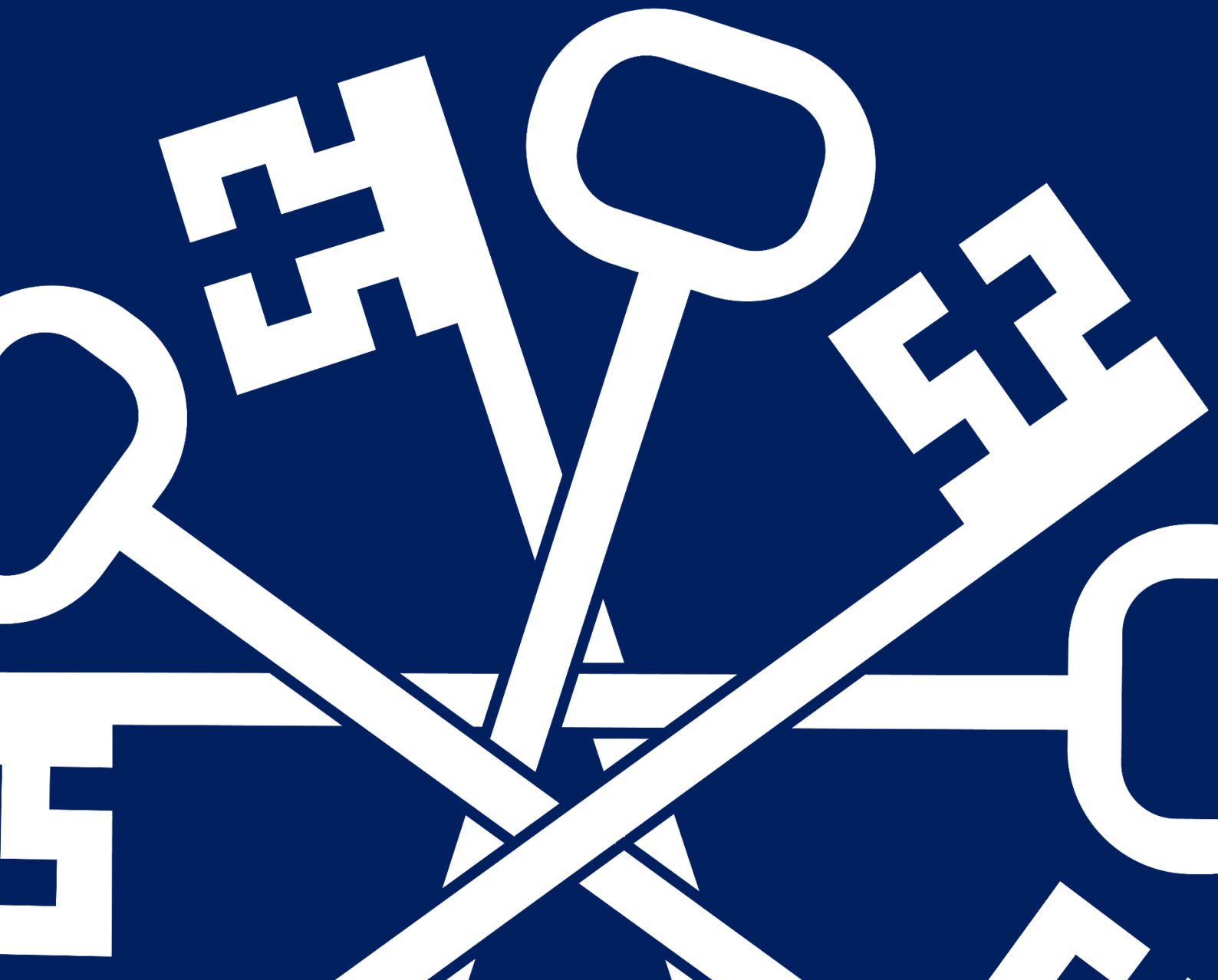




KEYS  
ACADEMIES  
TRUST

# Safeguarding and Child Protection Policy Version 2.1



## Contents

1. Policy Statement.....	3
2. Change Summary.....	3
3. Definitions.....	5
4. Context.....	5
5. Background.....	7
6. Purpose.....	8
7. Scope.....	8
8. Useful Contacts.....	8
9. Prevention.....	9
10. Procedures .....	12
11. Multi-agency working.....	14
12. Record keeping.....	15
13. Confidentiality and information sharing .....	16
14. Communication with parents/carers .....	17
15. Child-on-child abuse .....	17
16. Dealing with child-on-child sexual violence and sexual harassment between children....	18
17. Supporting Children .....	19
18. Children with disabilities, certain health conditions, additional needs or special educational needs .....	20
19. Young carers.....	21
20. Children at risk of criminal exploitation .....	21
21. Children at risk of child sexual exploitation .....	21
22. Children frequently absent from education .....	22
23. Children misusing drugs or alcohol .....	23
24. Children living with substance misusing parents and carers.....	23
25. Children living with domestic abuse .....	24
26. Children at risk of 'honour-based' abuse including female genital mutilation.....	25
27. Children who have returned home to their family from care .....	26
28. Children showing signs of abuse, neglect or exploitation .....	26
29. Children at risk of radicalisation .....	26
30. Privately fostered children.....	27
31. Children with family members in prison .....	27
32. Preventing Unsuitable People From Working With Children .....	27
33. Allegations that may meet the harms threshold (KCSIE Part Four, Section One).....	28
34. Concerns that do not meet the harms threshold .....	29

35. Other Related Policies and Procedures.....	30
36. Academy Committee Safeguarding Responsibilities .....	30
37. Use of Trust premises for non-Trust activities .....	31
38. Version History .....	31
39. Appendix 1: Dealing With Allegations Or Concerns About An Adult Working With Children.....	33



## 1. Policy Statement

- 1.1. At the heart of our mission is the belief that every individual has untapped potential waiting to be unlocked. By fostering an environment that challenges and supports growth, we want to create pathways for social mobility. By providing the right tools, guidance, and opportunities, we enable each person to overcome barriers and reach their fullest potential.
- 1.2. We want our schools to not only places of learning but vibrant communities where every person feels they truly belong. Within this students, teachers, and support staff alike should feel they are developing and succeeding. This success should be an achievable reality for all, irrespective of background or circumstance. It may be quite different for each of us, but the key is the feeling of pride in doing well and enjoyment of the journey.
- 1.3. We are committed to building inclusive environments where the uniqueness of every individual is celebrated, and where collective growth is the norm.

## 2. Change Summary

- 2.1. Policy updated using Peterborough City Council model policy, including most recent KCSiE updates to policy.



<b>Name of Academy</b>	Thorpe Primary
<b>Designated Safeguarding Lead</b>	Paula Jeremaes
<b>Deputy Designated Safeguarding Leads</b>	Linzi Mastrocristino
<b>Prevent Lead</b>	Paula Jeremaes
<b>Domestic Abuse Lead</b>	Linzi Mastrocristino
<b>School Safeguarding Governor</b>	Anne Clayton
<b>School Safeguarding Email Address</b>	TPS-AllSafeguarding@tps.pkat.co.uk
<b>Names of Safer Recruitment Trained Staff</b>	Jamie Parkhouse Paula Jeremaes Natalie Oxe Julie Britten
<b>Date Policy Ratified by Academy Committee</b>	01/10/2024 (contacts amended 10/09/2025)

### 3. Definitions

#### 3.1. Terms and definitions used in this policy:

Term	Definition
SRO	Senior Responsible Officer
PCC	Peterborough City Council
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
SEND	Special Educational Needs and Disabilities
PECS	Pyramid Exchange Communication System
CSE	Child Sexual Exploitation
FGM	Female Genital Mutilation
MARAC	Multi Agency Risk Assessment Conference
HBA	Honour Based Abuse
CSE	Child Sexual Exploitation
CCE	Child Criminal Exploitation
LADO	Local Authority Designated Officer
EYFS	Early Years Foundation Stage

### 4. Context

#### 4.1. Internal and external context relevant to this policy:

<b>Internal Documents</b> <i>List of internal documents related to this policy. Include reference numbers and links for easy access.</i>	<ul style="list-style-type: none"> <li>• Anti-bullying policy</li> <li>• Attendance policy (including Children who are absent from Education)</li> <li>• Behaviour policy</li> <li>• Complaints policy</li> <li>• Critical Incident plan</li> <li>• Equality policy</li> <li>• First Aid policy</li> <li>• Health and Safety policy</li> <li>• Intimate Care policy</li> <li>• Lone Working policy</li> <li>• Online Safety and Acceptable Use policy</li> <li>• Physical Intervention and/or Use of Reasonable Force policy</li> <li>• Protocol for children not collected from school at the end of the school day/activity</li> <li>• Responding to Prejudice Related incidents policy</li> <li>• Safer Recruitment policy</li> <li>• Staff Code of Conduct/Safer Working Practice</li> <li>• Staff Discipline and Grievance procedures</li> <li>• Supporting Pupils with Medical Conditions policy</li> </ul>
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	<ul style="list-style-type: none"> <li>• Use of Mobile Phone and Other Smart Devices Policy</li> <li>• Whistleblowing policy</li> </ul>
<p><b>Legislation, Standards, etc.</b></p> <p><i>List of external legislation or government regulations, etc. relating to this policy. Include website links for easy access.</i></p>	<ul style="list-style-type: none"> <li>• <a href="#">A guide to the data protection exemptions   ICO</a></li> <li>• <a href="#">Addressing Child-on-Child Abuse</a></li> <li>• <a href="#">After-school clubs, community activities, and tuition - safeguarding guidance for providers</a></li> <li>• <a href="#">Alternative provision - GOV.UK</a></li> <li>• <a href="#">Cambridgeshire &amp; Peterborough Safeguarding Partnership Board</a></li> <li>• <a href="#">Child abuse concerns: guide for practitioners - GOV.UK</a></li> <li>• <a href="#">Child-Sexual-Behaviour-Assessment-Tool</a></li> <li>• <a href="#">Contextual Risk Screening Tool</a></li> <li>• <a href="#">Cyber security training for school staff - NCSC.GOV.UK</a></li> <li>• <a href="#">Data Protection Act 2018</a></li> <li>• <a href="#">DfE Non-Statutory Information Sharing Advice for Practitioners Providing Safeguarding Services for Children, Young People, Parents and Carers</a></li> <li>• <a href="#">Domestic Abuse Act 2021</a></li> <li>• <a href="#">Early years foundation stage statutory framework for childminders</a></li> <li>• <a href="#">Education Act 2002</a></li> <li>• <a href="#">Education for children with health needs who cannot attend school - GOV.UK</a></li> <li>• <a href="#">Equality Act 2010</a></li> <li>• <a href="#">Female Genital Mutilation Act 2003</a></li> <li>• <a href="#">Generative AI: product safety expectations - GOV.UK</a></li> <li>• <a href="#">Guidance for safer working practice for those working with children and young people in educational settings</a></li> <li>• <a href="#">Home - Shore</a></li> <li>• <a href="#">Human Rights Act 1998</a></li> <li>• <a href="#">Keeping Children Safe in Education 2025</a></li> <li>• <a href="#">Lucy Faithfull Foundation - Preventing child sexual abuse</a></li> <li>• <a href="#">Marriage and Civil Partnership (Minimum Age) Act 2022</a></li> <li>• <a href="#">Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK</a></li> <li>• <a href="#">Multi-Agency Policies and Procedures   Cambridgeshire and Peterborough Safeguarding Partnership Board</a></li> <li>• <a href="#">National Prevent referral form</a></li> <li>• <a href="#">Operation Encompass</a></li> <li>• <a href="#">Prevent duty guidance: England and Wales (2023)</a></li> <li>• <a href="#">Public Sector Equality Duty: guidance for public authorities - GOV.UK</a></li> <li>• <a href="#">Relationships Education, Relationships and Sex Education and Health Education guidance</a></li> <li>• <a href="#">Safer Corridors Action Toolkit</a></li> <li>• <a href="#">Sexual Offences Act 2003</a></li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="#">Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK</a></li> <li>• <a href="#">Shore - Lucy Faithfull Foundation</a></li> <li>• <a href="#">The Apprenticeships, Skills, Children and Learning Act 2009</a></li> <li>• <a href="#">The Education (Independent School Standards) Regulations 2014</a></li> <li>• <a href="#">The Non-Maintained Special Schools</a></li> <li>• <a href="#">The Prevent duty: an introduction for those with safeguarding responsibilities - GOV.UK</a></li> <li>• <a href="#">United Kingdom General Data Protection Regulation</a></li> <li>• <a href="#">When to call the police: Guidance for schools and colleges</a></li> <li>• <a href="#">Working Together to Improve School Attendance</a></li> <li>• <a href="#">Working Together to Safeguard Children: Statutory Guidance</a></li> </ul>
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## 5. Background

- 5.1. Academies in Keys Academies Trust fully recognise the responsibility it has under section 175 of the Education Act 2002 (as amended The Non-Maintained Special Schools, The Apprenticeships, Skills, Children and Learning Act 2009 (as amended), and DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers to have arrangements in place to safeguard and promote the welfare of children.
- 5.2. This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education 2025. All staff must be made aware of their duties and responsibilities under Part One of this document, which are set out below.
- 5.3. All staff should read the above document together with Annex B of Keeping Children Safe in Education 2025, if they are working directly with children. For those staff who do not work directly with children, Keeping Children Safe in Education 2025's Annex A can be issued instead. Through their day-to-day contact with pupils and direct work with families all staff in Trust have a responsibility to:
  - a) Identify concerns early to prevent them from escalating,
  - b) Provide a safe environment in which children can learn,
  - c) Identify children who may benefit from early help,
  - d) Know what to do if a child tells them he/she is being abused or neglected,
  - e) Follow the referral process if they have a concern.



- 5.4. It is consistent with the [Cambridgeshire & Peterborough Safeguarding Partnership Board](#) procedures.

## 6. Purpose

- 6.1. There are four main elements to this policy:
- a) **Prevention** – Through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos;
  - b) **Procedures** – For identifying and referring cases, or suspected cases, of abuse or exploitation.
  - c) **Supporting children** – Particularly those who may have been abused or witnessed violence towards others.
  - d) **Preventing unsuitable people working with children** – Processes are followed to ensure that those who are unsuitable to work with children are not employed.
- 6.2. This policy is available to parents on request and is on the Trust website.

## 7. Scope

- 7.1. This policy sets out how the Trust's trustees and Academy Committees discharge its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils in Trust academies. Our policy applies to all staff, paid and unpaid, working in the school including governors. Teaching assistants, mid-day supervisors, office staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the school.

## 8. Useful Contacts

Useful Contact	Communication Route
PCC Education Safeguarding Team	<a href="mailto:Peterborougheducationsafeguarding@peterborough.gov.uk">Peterborougheducationsafeguarding@peterborough.gov.uk</a>
PCC Education Safeguarding Manager	<a href="mailto:Rebecca.gibson@peterborough.gov.uk">Rebecca.gibson@peterborough.gov.uk</a>
PCC Education Safeguarding Advisor	<a href="mailto:Louise.hooper@peterborough.gov.uk">Louise.hooper@peterborough.gov.uk</a>
PCC Education Navigator – MASH	<a href="mailto:pcceducationnavigator@peterborough.gov.uk">pcceducationnavigator@peterborough.gov.uk</a>
Early Help/Targeted Support	Tel: 01733 863649
MASH – General Enquiries	Tel: 01733 864170
MASH – Professional Consultation Line	Tel: 01733 864180
MASH referral Portal	<a href="#">Professional (peterborough.gov.uk)</a>

Emergency Duty Team (out of hours)	Tel: 01733 234724
Local Authority Designated Officer (LADO)	<a href="mailto:lado@peterborough.gov.uk">lado@peterborough.gov.uk</a> Tel: 01733 864038
Police Child Abuse Investigation Unit	Tel: 101
Prevent Officers	<a href="mailto:prevent@cambs.police.uk">prevent@cambs.police.uk</a> Tel: 01480 422596
Cambridgeshire and Peterborough Safeguarding Partnership Board – Safeguarding Multi-Agency Procedures	<a href="#">Multi-Agency Policies and Procedures   Cambridgeshire and Peterborough Safeguarding Partnership Board</a>

## 9. Prevention

### 9.1. Standard commitments

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.

Academies in the Trust will:

- a) Establish and maintain an environment where children feel safe, including in a digital context, and are encouraged to talk and are listened to,
- b) Ensure children know that there are trusted adults in the academy whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate,
- c) Tailor the curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities,
- d) Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality,
- e) Ensure that all academy staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, bi-phobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Responding to Prejudice-Related Incidents Policy'.

### 9.2. For primary and special schools

Primary Academies in the Trust will:

- a) Incorporate [Relationships Education, Relationships and Sex Education and Health Education guidance](#) into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:
  - i. How to recognise if family relationships are making them feel unhappy or unsafe and how to seek help or advice from others if needed,
  - ii. How to recognise who to trust and who not to trust, how to judge when a friendship is making them feel unhappy or uncomfortable and how to seek help or advice from others, if needed,
  - iii. The importance of permission-seeking and giving in relationships with friends, peers and adults,
  - iv. That some people behave differently online, including by pretending to be someone they are not,
  - v. The rules and principles for keeping safe online, how to recognise risks, harmful context and contact and how to report them,
  - vi. How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met,
  - vii. About the concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to being safe,
  - viii. That each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical and other contact,
  - ix. How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know,
  - x. How to recognise and report feelings of being unsafe or feeling bad about any adult or other children,
  - xi. How to ask for advice or help for themselves or others, and to keep trying until they are heard,
  - xii. How to report concerns or abuse, and the vocabulary and confidence needed to do so,
  - xiii. Where to get advice e.g. family, school and/or other sources.

9.3. For secondary schools

- a) Incorporate [Relationships Education, Relationships and Sex Education and Health Education guidance](#) into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:

- b) How to determine whether other children, adults or sources of information are trustworthy,
  - c) How to judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships),
  - d) How to seek help or advice, including reporting concerns about others, if needed,
  - e) The characteristics of positive and healthy friendships,
  - f) That some types of behaviour within relationships are criminal, including violent behaviour and coercive control,
  - g) What constitutes sexual harassment and sexual violence and why these are always unacceptable,
  - h) About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removing potentially compromising material placed online,
  - i) What to do and where to get support to report material or manage issues online,
  - j) The impact of viewing harmful content,
  - k) That specifically explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners,
  - l) That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including prison,
  - m) The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships,
  - n) How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).
- 9.4. Nursery, primary and special schools using the personal safety units from the Cambridgeshire PSHE service personal development programme
- We use the Personal Safety Units from the Cambridgeshire PSHE Service Personal Development Programme in nursery settings.
- 9.5. Secondary and post-16 settings
- We use [Safer Corridors Action Toolkit](#) developed by the Cambridgeshire PSHE Service
- 9.6. Primary settings

We use [Safer Spaces Action Toolkit](#) developed by the Cambridgeshire PSHE Service which supports schools with listening to pupil voice, building awareness and engaging in reflection as part of a whole school approach to preventing sexist attitudes and behaviours which cause others to feel unsafe.

## 10. Procedures

### 10.1. Multi-agency procedures

We will follow the procedures set out in the [Cambridgeshire & Peterborough Safeguarding Partnership Board](#) 'Multi-Agency Procedures'. A copy of these procedures can be found on their [website](#).

### 10.2. The Academy Committee will ensure academies:

- a) Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.
- b) Ensure that the role of DSL and DDSL is explicit in the role holder's job description (as outlined in [Keeping children safe in education 2025](#) Annex C).
- c) Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters (see [Keeping children safe in education 2025](#) Annex C). Ensure that the DSL and deputies have undertaken the two-day training provided by the Education Safeguarding Team and that this training is updated **at least every two years**.
- d) Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via updates, meetings or additional training **at least annually**.
- e) Ensure that every member of staff, paid and unpaid, and the academy committee knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the **point of induction**.
- f) Ensure all staff understand the requirement to log any concerns on MyConcern within 15 minutes of the concern being raised.
- g) Ensure that the DSL or DDSL are always available (during school hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL and DDSL are not available.
- h) Liaise with the three statutory safeguarding partners (Local Authority, Integrated Care Board and police) as appropriate and work with other agencies in line with [Working Together to Safeguard Children: Statutory Guidance](#).

- i) Nominate an Academy Committee member for safeguarding and child protection who has undertaken appropriate training.
- j) Ensure every member of staff and every governor knows:
  - i. The name of the Designated Safeguarding Lead/Deputies and their role,
  - ii. How to identify the signs of abuse and neglect, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online,
  - iii. That children may not 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,
  - iv. How to pass on and record concerns about a pupil/student,
  - v. That they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation; and for referring safeguarding concerns to the DSL/DDSL,
  - vi. What is meant by, and the importance of, showing professional curiosity
  - vii. that they have a responsibility to provide a safe environment in which children can learn,
  - viii. Where to find the Multi-Agency Procedures on the Safeguarding Children Partnership Board website,
  - ix. Their role in the early help process,
  - x. The process for making referrals to children's social care,
  - xi. The safeguarding response to children who are absent from education; particularly on repeat occasions and/or prolonged periods,

10.3. The role of filtering and monitoring and the process for reporting issues:

- a) Ensure all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction. This should also include training on disinformation, misinformation and conspiracy theories. The training should be **regularly updated**, at least annually, (including online safety) to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- b) The Academy's online safety policy is reflective of the requirements set out in [Keeping Children Safe in Education 2025](#), [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges](#) and [Generative AI: product safety expectations - GOV.UK](#). The school's online safety policy is aligned to the Trust's behaviour policy and reflects our approach to issues of online safety (including [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)); empowering us to protect and educate the whole Trust community in their use of

technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

- c) Ensure that **all** staff recognise their duty and feel able to raise concerns about poor or unsafe practice regarding children. Such concerns are addressed sensitively and effectively in accordance with whistle-blowing policies, including low level concerns and allegations against staff. See Appendix 1: Dealing With Allegations Or Concerns About An Adult Working With Children for more information.
- d) Ensure that parents are informed of the responsibility placed on the school and staff in relation to child protection by setting out these duties in the school prospectus, website and home/school agreements.
- e) Ensure that this policy is available publicly either via the school office and on the website.
- f) Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.
- g) Where pupils are educated off site or in alternative provision, the school and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the school.
- h) When pupils are educated off-site ([Education for children with health needs who cannot attend school](#)) or in [Alternative Provision](#), schools/colleges must ensure they:
  - i. Obtain written confirmation from the alternative provider that all staff have undergone appropriate safeguarding checks,
  - ii. Request written details of any arrangements that could pose a risk to the child,
  - iii. Keep records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend,
  - iv. Regularly review the placement to ensure it remains safe and suitable for the child's needs,
  - v. If safeguarding concerns arise, the placement must be immediately reviewed and ended if necessary.

## 11. Multi-agency working

### 11.1. Trust Academies will:

- a) Work to develop effective links with relevant services to promote the safety and welfare of all pupils/students,

- b) Co-operate as required, in line with [Working Together to Safeguard Children: Statutory Guidance](#), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- c) The DfE statutory guidance on school attendance [Working Together to Improve School Attendance](#) will be followed and school must work with local authority children's services where school absence indicates safeguarding concerns.
- d) Notify the relevant Social Care Team immediately if:
- e) It should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently),
- f) There is an unexplained absence of a pupil who is subject to a Child Protection Plan,
- g) There is any change in circumstances to a pupil who is subject to a Child Protection Plan.
- h) When a pupil who is subject to a Child Protection Plan leaves, information will be transferred to the new school immediately. The Child Protection Chair and Social Care Team will also be informed.

## 12. Record keeping

- 12.1. Trust Academies will keep clear, detailed, accurate, written records of concerns about children, even where there is no need to refer the matter to Children's Social Care immediately.
- 12.2. Records should include:
  - a) A clear and comprehensive summary of the concern,
  - b) The child's wishes and feelings,
  - c) Details of how the concern was followed up and resolved,
  - d) A note of any action taken, decisions reached and the outcome,
  - e) A record of any discussion/communication with parents, other agencies etc.
- 12.3. Electronic records are stored on an identified, purpose-built, secure platform (MyConcern)) and meets the DfE's [Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges](#). All staff are directed to the National Cyber Security Centre's (NCSC) [Cyber security training for school staff](#).
- 12.4. Ensure all relevant safeguarding records are sent to the receiving school or establishment when a pupil moves schools, within five days.



- 12.5. The DSL will consider whether it would be appropriate to share information with the new setting in advance of a child leaving.
- 12.6. Make parents aware that such records exist except where to do so would place the child at risk of harm.
- 12.7. Ensure all actions and decisions are led by what is considered to be in the best interests of the child.

## 13. Confidentiality and information sharing

- 13.1. Information about children and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is governed by the [United Kingdom General Data Protection Regulation](#) (UK GDPR) and the [Data Protection Act 2018](#).
- 13.2. Trust Academies will:
  - a) Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately,
  - b) Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, ([DfE Non-Statutory Information Sharing Advice for Practitioners Providing Safeguarding Services for Children, Young People, Parents and Carers](#)),
  - c) Ensure that if a member of staff receives a Subject Access Request (under the [Data Protection Act 2018](#)) from a pupil or parent they will refer the request to the DSL or Headteacher,
  - d) Ensure staff are clear with children that they cannot promise to keep secrets.
- 13.3. The Designated Safeguarding Lead/Deputies will:
  - a) Disclose information about a pupil to other members of staff on a 'need to know' basis, considering what is necessary, proportionate and relevant. Parental consent may be required,
  - b) Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent where to do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime,
  - c) Record when decisions are made to share or withhold information, who information has been shared with and why.
  - d) In cases where the [Serious Harm Test](#) is met, schools must withhold providing the data in compliance with schools' obligations under the [Data Protection Act 2018](#) and the [UK GDPR](#). Where in doubt, schools should seek independent legal advice,
  - e) Seek advice about confidentiality from outside agencies if required.

## 14. Communication with parents/carers

14.1. The Academy will:

- a) Ensure that parents/carers are informed of the responsibility placed on the setting and staff in relation to child protection by setting out its duties in the school website.
- b) Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action.
- c) Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents. For example, if the Academy believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

## 15. Child-on-child abuse

15.1. [Addressing Child-on-Child Abuse](#) is a useful resource for schools and colleges. We recognise that child-on-child abuse can manifest itself in many ways. This can include but is not limited to:

- a) Bullying (including cyberbullying,
- b) Prejudice-based and discriminatory bullying),
- c) Abuse within intimate partner relationships,
- d) Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
- e) Sexual violence and sexual harassment,
- f) Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos,
- g) 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,
- h) Upskirting and initiation or hazing type violence and rituals.

15.2. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

All forms of child-on-child abuse are unacceptable and will be taken seriously.

15.3. The Academy will:

- a) Create a whole school protective ethos in which child-on-child abuse, including sexual violence and sexual harassment will not be tolerated,
  - b) Provide training for staff about recognising and responding to child-on-child abuse; including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators,
  - c) Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or 'banter',
  - d) Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online,
  - e) Provide high quality Relationship and Sex Education (RSE), Health Education (HE) and/or enrichment programmes including teaching about consent,
  - f) Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding procedures.
  - g) Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.
- 15.4. The Designated Safeguarding Lead will refer to the [Cambridgeshire & Peterborough Safeguarding Partnership Board's Child-Sexual-Behaviour-Assessment-Tool](#) if there is a concern that a young person may be displaying sexually harmful behaviours.

## 16. Dealing with child-on-child sexual violence and sexual harassment between children

- 16.1. Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 16.2. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, may adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.
- 16.3. The Academy will:
- a) Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated,
  - b) Provide training for staff on how to manage a report of sexual violence or sexual harassment.

- c) Make decisions on a case-by-case basis,
- d) Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making,
- e) Implement measures to keep the victim, alleged perpetrator and, if necessary, other children and staff members safe. Record any risk assessments and keep them under review,
- f) Consider the welfare of both the victim(s) and perpetrator(s) in these situations,
- g) Liaise closely with external agencies, including police and social care, when required,
- h) Refer to [Keeping Children Safe in Education 2025](#) for full details of procedures to be followed in such cases. Also see [Sharing nudes and semi-nudes: how to respond to an incident](#).

## 17. Supporting Children

17.1. The Academy recognises that **any** child may be subject to abuse and 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. Staff will be made aware of [Child abuse concerns: guide for practitioners](#) and [When to call the police: Guidance for schools and colleges](#); supporting all children by:

- a) Providing curricular opportunities to encourage self-esteem and self-motivation,
- b) Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community,
- c) Applying the school's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. The school will ensure that the pupil knows that some behaviour is unacceptable, but s/he is valued and not to be blamed for any abuse which has occurred,
- d) Liaising with the senior mental health lead where safeguarding concerns are linked to mental health in school/college for advice on case management,
- e) Liaising with other agencies which support the pupil such as Social Care, Police, Child and Adolescent Mental Health Services, Emotional Health and Wellbeing Service, Sexual Behaviour Service or Early Help (Targeted Support) Teams,
- f) Refer to the [Lucy Faithfull Foundation](#)'s [Shore Space](#). Which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours,
- g) Promoting supportive engagement with parents and carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

- 17.2. The Academy recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see page 10 of [Keeping children safe in education 2025](#) for the complete list.

## 18. Children with disabilities, certain health conditions, additional needs or special educational needs

- 18.1. The Trust SEND Policy is available on the Trust website.
- 18.2. We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. Staff who deal with children with complex and multiple disabilities, emotional and behavioural challenges should be particularly sensitive to indicators of abuse.
- 18.3. The Academy has pupils with emotional and behavioural difficulties or challenging behaviours. The Academy will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents and carers.
- 18.4. As part of the PSHE curriculum, staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as:
- a) How to recognise if they are feeling unsafe including within family relationships and friendships,
  - b) How to ask for help,
  - c) The difference between safe and unsafe secrets,
  - d) The difference between safe and unsafe physical contact,
  - e) How to recognise and manage risk including online.
- 18.5. The content of lessons will be shared with parents and carers so that these skills can be supported at home.
- 18.6. The school has pupils who may have communication difficulties. We are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.
- 18.7. Under the [Equality Act 2010](#), there is also a duty to make reasonable adjustments for disabled children and young people.
- 18.8. Where necessary, the school will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.

- 18.9. We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

## 19. Young carers

- 19.1. The school recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.
- 19.2. The Academy will:
- a) Seek to identify young carers,
  - b) Offer additional support internally,
  - c) Signpost to external agencies,
  - d) Be particularly vigilant to the welfare of young carers, and
  - e) Follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

## 20. Children at risk of criminal exploitation

- 20.1. Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.
- 20.2. All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. This is known as Extra-Familial Harm/Contextual Safeguarding and Risk Outside the Home. The school will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.
- 20.3. The Designated Safeguarding Lead will complete [Cambridgeshire & Peterborough Safeguarding Partnership Board's Contextual Risk Screening Tool](#) and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.
- 20.4. The school recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

## 21. Children at risk of child sexual exploitation

- 21.1. 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 using technology.
- 21.2. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- 21.3. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.
- 21.4. The Designated Safeguarding Lead will complete the [Cambridgeshire & Peterborough Safeguarding Partnership Board's Contextual Risk Screening Tool](#) and refer to Social Care if there is a concern that a young person may be at risk of CSE.
- 21.5. The Academy recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.
- 21.6. Academies are working in partnership with Cambridgeshire Police and Peterborough County Council identify and provide appropriate support to pupils who have gone missing through the [Operation Encompass](#) scheme.
- 21.7. Peterborough's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

## 22. Children frequently absent from education

- 22.1. The DfE statutory guidance on school attendance [Working Together to Improve School Attendance](#) will be followed and school must work with local authority children's services where school absence indicates safeguarding concerns.
- 22.2. Academies recognise that children who are absent from education, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones and risk of FGM or forced marriage.

- 22.3. The school monitors and follows up on the attendance of individual pupils closely, as outlined in their Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.
- 22.4. The school endeavours to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child who is absent from education is identified as a welfare and/or safeguarding concern.
- 22.5. The school will inform Social Care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

## 23. Children misusing drugs or alcohol

- 23.1. The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient to initiate child protection proceedings.
- 23.2. The Academy will consider such action when there is evidence or reasonable cause:
  - a) To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse,
  - b) To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults,
  - c) Where the misuse is suspected of being linked to parent/carer substance misuse,
  - d) Where the misuse indicates an urgent health or safeguarding concern,
  - e) Where the child is perceived to be at risk of harm through any substance associated criminality.

## 24. Children living with substance misusing parents and carers

- 24.1. Misuse of drugs or alcohol is strongly associated with significant harm to children, especially when combined with other features such as domestic abuse.
- 24.2. When the Academy receives information about drug and alcohol abuse by a child's parents or carers, they will follow appropriate procedures.
- 24.3. This is particularly important if the following factors are present:
  - a) Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children,
  - b) Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers,
  - c) The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour,



- d) Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance,
- e) Disturbed moods because of withdrawal symptoms or dependency,
- f) Unsafe storage of drugs and/or alcohol or injecting equipment,
- g) Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child.

## 25. Children living with domestic abuse

- 25.1. The [Domestic Abuse Act 2021](#) applies to those aged 16 or over and introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.
- 25.2. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 25.3. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).
- 25.4. Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:
- a) Psychological,
  - b) Physical,
  - c) Sexual,
  - d) Financial, and
  - e) Emotional, coercive or controlling behaviour.
- 25.5. The Academy recognises that where there is domestic abuse in a family, the children or young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm. Domestic abuse can also affect children in their personal relationships as well as in the context of home life.
- 25.6. Staff will follow the procedures outlined in this policy if concerns of domestic abuse arise. The school will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

- 25.7. Academies work in partnership with Cambridgeshire Police and Peterborough City Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called [Operation Encompass](#).
- 25.8. To achieve this, Peterborough's Education Safeguarding Team will share police information of all domestic incidents to which Police have been called, where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead. All such notifications will be shared by the PCC Education Navigator if the appropriate consent has been obtained.
- 25.9. On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

## 26. Children at risk of 'honour-based' abuse including female genital mutilation

- 26.1. So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The school takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.
- 26.2. The [Marriage and Civil Partnership \(Minimum Age\) Act 2022](#) bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18.
- 26.3. It is a criminal offence to exploit vulnerable children by arranging for them to marry under any circumstances.
- 26.4. The Academy will manage any concerns relating to forced marriage sensitively and will report concerns immediately using the procedures outlined in this policy.
- 26.5. FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.
- 26.6. In accordance with the [Female Genital Mutilation Act 2003](#), it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

## 27. Children who have returned home to their family from care

- 27.1. The school recognises that a previously looked after child potentially remains vulnerable. School will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the [Cambridgeshire & Peterborough Safeguarding Partnership Board's Multi-Agency Policies and Procedures](#).

## 28. Children showing signs of abuse, neglect or exploitation

- 28.1. School recognises that experiencing abuse, neglect and/or exploitation may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse, neglect and/or exploitation may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.
- 28.2. 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. Extra-familial harms (Risks outside the Home – ROTH) take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- 28.3. School will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

## 29. Children at risk of radicalisation

- 29.1. Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a school or colleges safeguarding approach.
- 29.2. The academy committee will ensure that a DSL has undertaken Prevent Lead training (refreshed every 2yrs) and that all staff receive training about the Prevent Duty within induction and regular updates/annual refreshers.

- 29.3. Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. Designated Safeguarding Leads (and Deputies) should be aware of local procedures for completing a [National Prevent referral form](#).
- 29.4. See also [The Prevent duty: an introduction for those with safeguarding responsibilities](#), and [Prevent duty guidance: England and Wales \(2023\)](#).

## 30. Privately fostered children

- 30.1. Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or close relative, in their own home for 28 days or more.
- 30.2. The school will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements via a Safeguarding Referral. [Professionals – Making a Referral | Cambridgeshire and Peterborough Safeguarding Partnership Board](#)

## 31. Children with family members in prison

- 31.1. The school is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.
- 31.2. The school recognises that children with family members in prison are at risk of poor outcomes including:
- a) Poverty,
  - b) Stigma,
  - c) Isolation,
  - d) Poor mental health, and
  - e) Poor attendance.
- 31.3. The school will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.
- 31.4. The school will work with the family, specialist organisations and the child to minimise the risk of the child not achieving their full potential.

## 32. Preventing Unsuitable People From Working With Children

- 32.1. The school will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of [Keeping Children Safe in Education 2025](#). This section should be read in conjunction with the school's Safer Recruitment Policy.
- 32.2. The academy committee will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

### 33. Allegations that may meet the harms threshold (KCSIE Part Four, Section One)

- 33.1. Any allegation of abuse made against teachers, (including supply staff, other staff, volunteers and contractors) that meets the harms threshold as set out in [Keeping Children Safe in Education 2025](#), Part Four, Section One, will be reported straight away to the Academy Headteacher. *If the concern is about a Headteacher, it will be reported straight away to the Chief Executive Officer of Keys Academies Trust.*
- 33.2. The school or Trust will follow the procedures set out in Part Four of [Keeping Children Safe in Education 2025](#).
- 33.3. The school will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a teacher, member of supply staff or other staff, volunteer or contractor and adhere to the relevant procedures set out in '[Keeping Children Safe in Education 2025](#), Part Four and the school's HR Policies as well as seek advice from their HR provider.
- 33.4. The Headteacher or CEO will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.
- 33.5. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Schools and colleges will use the guidance chart found in Appendix 1: Dealing With Allegations Or Concerns About An Adult Working With Children to support their decision-making.
- 33.6. Where the academy identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.
- 33.7. Academies will consider:
  - a) **Looking after the welfare of the child** - the Designated Safeguarding Lead (or Deputy) 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.
  - b) **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

- 33.8. Academies will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- 33.9. Staff (including supply staff and volunteers) 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 should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

## 34. Concerns that do not meet the harms threshold

- 34.1. Low level concerns that do not meet the harms threshold should be reported to the Headteacher. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.
- 34.2. In cases where the Head Teacher or Principal is the subject of an allegation, it will be reported to the Chief Executive Officer. The school will follow the procedures set out in Part Four, Section Two of [‘Keeping Children Safe in Education 2025’](#).
- 34.3. The Academy will deal with any such concern, no matter how small, where an adult working in or on behalf of the school or college may have acted in a way that:
- a) Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
  - b) Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 34.4. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- 34.5. MyConcern Confide is used by all Academies to log low-level concerns. Records are be confidential, held securely and comply with the [Data Protection Act 2018](#) and the [UK GDPR](#).
- 34.6. The school will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable the school/college to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the Trust are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

- 34.7. Academies should ensure that **all** staff, including supply staff, volunteers and contractors, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents and carers as advised within the Local Authority's [Guidance for safer working practice for those working with children and young people in educational settings](#).
- 34.8. As part of the induction process, all staff, including supply staff, volunteers and contractors, will receive guidance about how to create appropriate professional boundaries (both online and offline) with all children, especially those with a disability or who are vulnerable. Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, or if on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 34.9. All staff have signed to confirm that they have read the [Lucy Faithfull Foundation's](#) 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.
- 34.10. Academies will ensure that staff, supply staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the [Sexual Offences Act 2003](#) (Abuse of Position of Trust).

## 35. Other Related Policies and Procedures

- 35.1. See section 4 for the links to relevant policies.

## 36. Academy Committee Safeguarding Responsibilities

- 36.1. Academy Committees should ensure they facilitate a whole Academy approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- 36.2. The Academy Committee fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in school are effective; always complying with the law and government guidance.
- 36.3. It will:
- Nominate a member for safeguarding who will take leadership responsibility for the school's safeguarding arrangements and practice and champion safeguarding issues,



- b) Ensure that all Academy Committee and trustees receive appropriate governor safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated,
- c) Ensure governors and trustees are aware of their obligations under the [Human Rights Act 1998](#), the [Equality Act 2010](#), the [Public Sector Equality Duty](#) and the [Local Multi-Agency Safeguarding Arrangements](#),
- d) Ensure an annual safeguarding report (Annual Safeguarding Monitoring Report for Governors) is made to the academy committee and copied to the Peterborough Education Safeguarding Team. Any weaknesses will be rectified without delay,
- e) Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff,
- f) Ensure that this Safeguarding and Child Protection policy is published on the school website,
- g) Ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems and ensure the effectiveness is regularly reviewed,
- h) Ensure children's wishes and feelings are considered where there are safeguarding concerns.

## 37. Use of Trust premises for non-Trust activities

- 37.1. If the academy committee provides extended facilities or before or after school activities directly under the supervision or management of school staff, the school's arrangements for safeguarding as written in this policy shall apply.
- 37.2. Where services or activities are provided separately by another organisation or individual, either on or off school site, the academy committee will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the school on these matters where appropriate.
- 37.3. The academy committee will use the guidance on [After-school clubs, community activities, and tuition - safeguarding guidance for providers](#), which details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

## 38. Version History

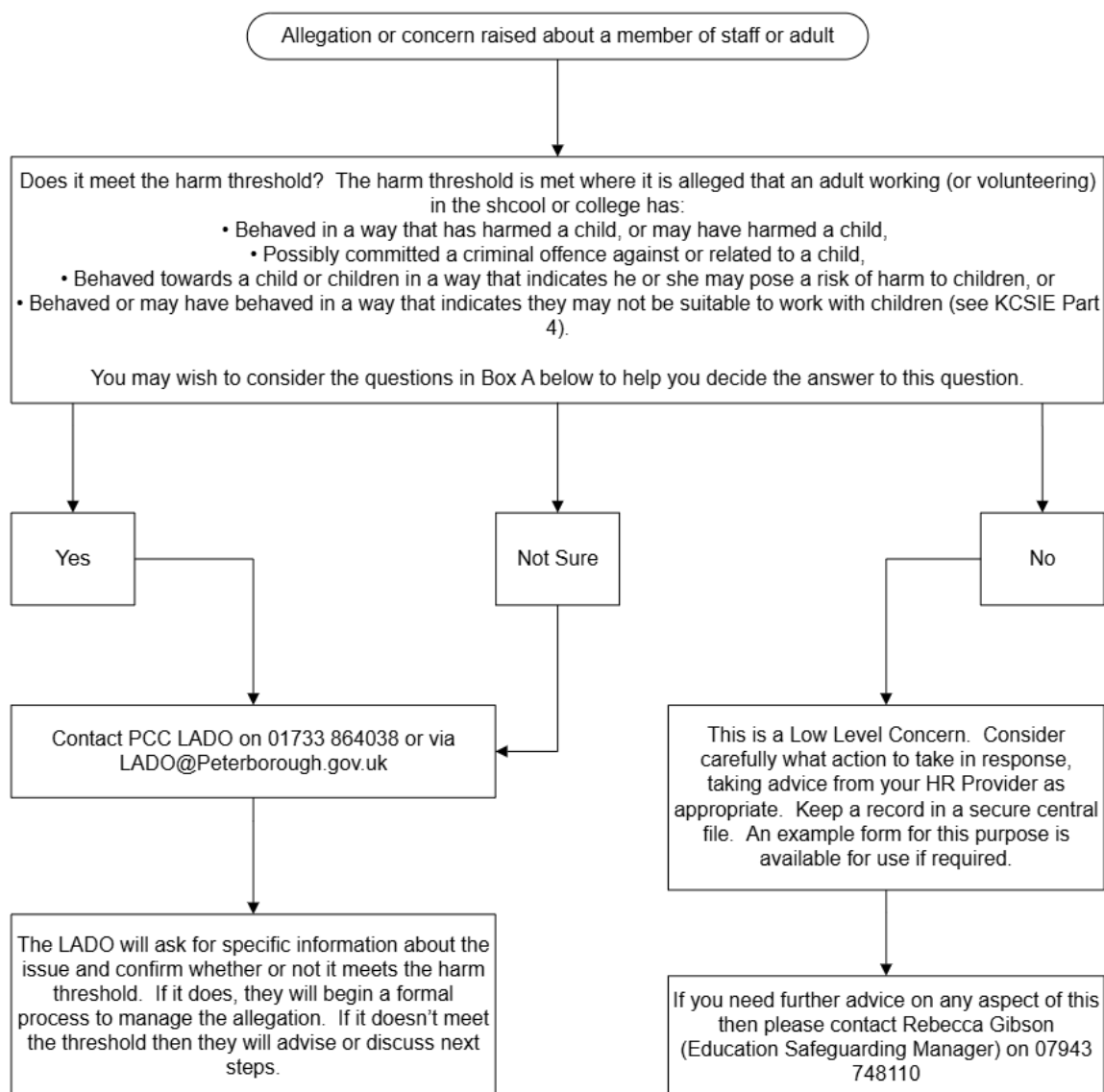
VERSION	ACTION	RESPONSIBLE	DATE
1.0	Policy transferred from PCC / CCC to new template		01/09/2023



2.0	Policy updated with reference to new KCSiE changes and reflective of new CCC provided template	Jude MACDONALD	01/09/2024
2.1	Policy update to reflect changes to KCSiE	Jude MACDONALD	01/09/2025



## 39. Appendix 1: Dealing With Allegations Or Concerns About An Adult Working With Children



### Box A

- How long has the adult or member of staff worked for you?
  - Have there been any previous concerns raised?
  - Is this a one-off or part of a pattern of behaviour?
  - Has the member of staff previously been given advice in this area?
  - Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)
  - Might this have been a planned action or event?
  - Could this behaviour be inadvertent? What is the likelihood of this?
  - Could this be the precursor to more concerning behaviour?
  - Did it occur in a 'public' or 'private' place? Was this in or out of school or college?
  - If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
  - If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it?
- What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?