

Safeguarding & Child Protection Policy – Phoenix Academy

**Review Date**

July 2026

Ratified

August 2026

Next Review Date

July 2027

Responsible Directorate

Safeguarding

About ATT

Our Values



ATT2030 sets a values-driven culture that is explicit about how we work and lead:

Belonging & Becoming: we meet each child where they are and refuse to leave them there - giving them both roots and wings.

Integrity & Excellence: we act ethically, celebrate excellence, and pursue high standards in all that we do.

High Trust, High Accountability: decision-making sits close to pupils and communities; principals are trusted as strategic leaders; the central team acts as expert partner; accountability is professional, dialogic, and focused on learning and improvement.

Our Three Goals

Everything in ATT2030 is organised around three interlinked goals that describe the kind of people - pupils and adults - that we are forming:

Capable: equipped with the knowledge, skills, and emotional readiness to perform to a high standard, adapt to change, and contribute meaningfully.

Competent: possessing the knowledge, habits, and judgement to get things done – well, reliably, and independently – handling setbacks and making steady progress.

Confident: feeling safe, happy, and known – secure enough to take risks, speak up, and grow with purpose and integrity.

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1 Our Strong Safeguarding Culture

Why it is important

- Safeguarding is everyone's responsibility and it is the duty of the Academy to safeguard and promote the welfare of children. This is our core safeguarding principle.
- In adhering to this principle, we focus on providing a safe and welcoming environment for all of our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All of our children have equal rights to support and protection.
- One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, trainee teachers and governors, all of whom are trained on its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law and guidance and best practice.
- We have 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 and operate in the best interests of the child.
- We embrace a child-centred approach and staff are encouraged to adopt the mindset 'it could happen here'. We recognise the importance of enabling children to talk openly about anything that worries them and to feel confident that they will be listened to or can access well publicised systems for reporting or disclosing abuse or harm.
- We recognise that safeguarding concerns rarely occur in isolation and that abuse, neglect, exploitation, online harms, mental health needs and welfare concerns often overlap.
- This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

What it means for our students

- We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child.
- All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any students or staff involved in child protection or safeguarding issues will receive appropriate support.
- Our strong safeguarding culture ensures that we treat all students with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among students and we set a good example by conducting ourselves appropriately.
- Identifying safeguarding and child protection concerns often begins with recognising changes in students' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Where challenging behaviour is presented, consideration should be made regarding whether this may be an indicator of abuse.
- All of our staff will reassure students that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

2 Safeguarding Legislation and Guidance

2.1 The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguarding Children (2023)
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act (2002)
- The Education (Independent Academy Standards) Regulations 2014
- The Domestic Abuse Act (2021)
- PACE Code C (2019)
- The Equality Act (2010)
- The Human Rights Act (1998)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024)
- Working together to Improve Academy Attendance (2024)
- Children Missing Education (2013)
- Searching, Screening and Confiscation (2022)
- General Data Protection Regulation (2018)
- Information Sharing: Advice for Practitioners (2024)
- Behaviour in Schools Advice for Headteachers and Academy Staff (2022)
- Prevent Duty (2021)
- Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance (2018)
- Statutory Framework for the Early Years Foundation Stage (EYFS)
- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026
- Cyber Security Standards for Schools and Colleges (DfE)
- Generative AI: Product Safety Expectations (DfE)

3 Roles, Responsibilities and Contacts

3.1 For a full list of the Titles, Names and Contact details of key staff including the DSL, Principal and Designated Teacher for Looked After Children, please see **Appendix 7**

The Designated Safeguarding Lead (DSL):

3.2 The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection (including online safety, filtering and monitoring) at the academy. The DSL's duties include:

- Ensuring child protection policies are known, understood and used appropriately by staff
- Providing regular training to ensure staff have relevant and up to date knowledge and skills to be able to undertake their safeguarding responsibilities (See Appendix 6, Staff Training Grid)
- Engaging with relevant training to provide them with the knowledge and skills required to carry out the role.
- Keeping all child safeguarding records secure and up to date and in line with statutory requirements in KCSIE as a minimum.
- Working with the board of trustees and local governing body to ensure that the Trust's child protection policies are reviewed annually and that the procedures are reviewed regularly

- Acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters
- Liaising with Principal regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and being aware of the requirement for Children to have an Appropriate Adult in relevant circumstances.
- Acting as a point of contact with the three safeguarding partners
- Making and managing referrals to children's social care, the police, or other agencies
- Taking part in strategy discussions and inter-agency meetings
- Liaising with the "case manager" and the designated officer(s) at the local authority if allegations are made against staff
- Making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- Transferring the child protection file to a child's new school
- Ensuring online safety procedures, including filtering and monitoring
- keeping written records of all concerns, discussions and decisions, including the rationale for those decisions
- Ensuring the use of the DFE's data protection guidance for schools, ensuring the academy are complying with data protection law and due process and policy is followed in relation to safeguarding information
- Working with the Principal to ensure that the relevant staffing ratios are met, where applicable and in particular in EYFS
- Working with the Principal to ensure that each EYFS child is assigned a key person

The Deputy Designated Safeguarding Lead(s):

- 3.3 Our Deputy DSL is trained to the same level as the DSL and supports the DSL with safeguarding matters on a day to day basis. The ultimate lead responsibility for child protection remains with the DSL.

The Safeguarding Governor/Trustee

- 3.4 The role of the safeguarding governor/Trustee is to provide support and challenge to the DSL and the leadership of the Academy on how they manage safeguarding so that the safety and wellbeing of children can continuously improve. The role includes:
- Understanding the requirements of the Governance Handbook and Keeping Children Safe in Education
 - Supporting and challenging the DSL on the standards of safeguarding at the Academy
 - Confirming that consistent and compliant safeguarding practice takes place across the Academy
 - Reporting to the board of trustees about the standard of safeguarding in the Academy
- 3.5 The DSL and the safeguarding governor/trustee meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the Academy.

4 Children Who May be Particularly Vulnerable

- 4.1 Some children are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination and prejudice. To ensure that all of our students receive equal protection, staff will recognise these vulnerabilities and barriers and will seek to identify and reduce them wherever possible

4.2 we give special consideration to children who:

- Are vulnerable because of their race, ethnicity, religion, disability, gender identity or sexuality
- Are vulnerable to being bullied, or engaging in bullying
- Are at risk of exploitation, modern slavery, forced marriage, female genital mutilation, or being drawn into extremism
- Live in chaotic or unsupportive home situations
- Live transient lifestyles or live away from home or in temporary accommodation
- Are looked after, post looked after or privately fostered children
- Are affected by parental substance abuse, domestic violence or parental mental health needs
- Are misusing alcohol or other drugs themselves
- Do not have English as a first language
- Have an Education and Health Care Plan or other identified Special Educational Need that makes them vulnerable
- Are young carers
- Have a mental health need
- Have a family member in custody or affected by parental offending
- Are persistently absent from academy (Persistently Absent; PA <90% or Seriously Persistently Absent; SPA <50%)
- Frequently missing or goes missing from education, home or care
- Have previously experienced multiple suspensions, is at risk of being permanently excluded from the academy or college and who attend alternative provision or a pupil referral unit
- Are experiencing socio-economic disadvantage, including those eligible for Pupil Premium funding and may face additional safeguarding vulnerabilities linked to poverty, housing instability, food insecurity, digital exclusion, reduced access to enrichment opportunities and increased exposure to exploitation.
- Children who are gender questioning

5 Children with Special Educational Needs and Disabilities

5.1 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, exploitation and neglect in this group of children, which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

5.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

6 Children Missing Education

- 6.1 Children missing education, particularly repeatedly, can be an indicator of abuse, neglect or exploitation, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.
- 6.2 Children absent from education, particularly repeatedly or for prolonged absences, will have safe and well calls and home visits, at least weekly, to maintain the working relationship with the academy. The academy will work to reduce barriers to academy attendance with the student and their family.
- 6.3 We closely monitor attendance, absence and exclusions and our DSL will take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the academy day.

7 Mental Health

- 7.1 Academies have an important role to play in supporting the mental health and wellbeing of their students.
- 7.2 All staff are aware that mental health problems can be an indicator of abuse, neglect or exploitation and, in some circumstances, may themselves become a safeguarding concern, including where there is risk of self-harm or suicide. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.
- 7.3 Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy and record their concern in writing.
- 7.4 For further information on mental health procedures please see the ATT Mental Health Policy.

8 Children Who Are Lesbian, Gay, Bisexual or Gender Questioning (LGB and Gender Questioning Children)

- 8.1 Being lesbian, gay or bisexual is not in itself a risk factor for harm. However, children who are, or are perceived to be, lesbian, gay or bisexual may be vulnerable to bullying, discrimination or abuse. We seek to reduce barriers and ensure that all children, including those who are gender questioning, have access to safe spaces and trusted adults.
- 8.2 We recognise that gender-questioning children may have additional vulnerabilities and that a cautious approach is appropriate. Some children may also have wider mental health, psychosocial or neurodevelopmental needs which should be considered when planning support.
- 8.3 When supporting a gender-questioning child, we will take a cautious, individualised approach that considers the child's needs, any available clinical advice and wider vulnerabilities, including the risk of bullying. We will normally work in partnership with parents and encourage families to seek clinical support where appropriate.
- 8.4 In rare circumstances where involving parents or carers in discussions about a child questioning their gender may increase the risk of harm to a child, the academy will consult the Designated Safeguarding Lead before contacting parents or carers or making any decisions about support.
- 8.5 Any decision relating to support for a gender questioning child will be based on the best interests of the child and consideration of the impact on other children.

- 8.6 The academy will not start a process of social transition, without consultation with student and parent/ carer. Requests will be considered on an individual basis, where raised by the child and their parents.
- 8.7 The rationale for decisions and support arrangements will be clearly documented and regularly reviewed.
- 8.8 The academy will comply with legal requirements relating to toilets, changing facilities and sport. In secondary schools, single-sex toilets and changing facilities will be maintained in accordance with statutory requirements. In primary schools, arrangements will be age-appropriate and compliant with relevant regulations, whilst ensuring that the privacy, dignity and safety of all children are protected.
- 8.9 Where appropriate, the academy may provide access to suitable individual, private or self-contained facilities for any child seeking greater privacy. Such arrangements will be considered as part of the academy's individual support planning and will not remove or replace single-sex provision for other pupils.

9 Child-on-Child Abuse

- 9.1 Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as ‘banter’, ‘just having a laugh’, ‘part of growing up’ or ‘boys being boys’. It is statistically more likely that boys will be perpetrators of child-on-child abuse and girls will be victims, but allegations will be dealt with in the same manner, regardless of gender.
- 9.2 All staff should be clear about the policy and procedures for addressing child-on-child abuse and maintain an attitude of ‘it could happen here’.
- 9.3 Child-on-child abuse can take many forms, including:
 - **Physical abuse** such as shaking, hitting, biting, kicking or hair pulling
 - **Bullying**, including cyberbullying, prejudice-based and discriminatory bullying
 - **Sexual violence and harassment** such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes and misogynistic behaviour.
 - **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
 - **Upskirting**, which involves taking a picture under a person’s clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm
 - **Consensual and non-consensual sharing of nude and semi-nude images and/or videos and/or videos**, including content created, altered or distributed using mobile devices, social media, messaging applications or artificial intelligence including pressuring others to share sexual content
 - **Abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
 - **Initiation/hazing** – used to induct newcomers into sports team or academy groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond.
- 9.4 Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.
- 9.5 All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

Minimising Risk

9.6 We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries
- Providing alternative, non-verbal routes for disclosure
- Using assemblies to outline acceptable and unacceptable behaviour
- Using RSE (Relationships and Sex Education) and PSHE (Personal, Social, Health and Economic Education) to educate and reinforce our messages through stories, role play, current affairs and other suitable activities
- Undertaking a preventative risk assessment to identify places and circumstances where risks of child on child abuse may be enhanced and to identify actions to mitigate these risks
- Ensuring that the academy is well supervised, especially in areas where children might be vulnerable.

Investigating Allegations

9.7 All allegations of child-on-child abuse should be passed to the DSL immediately who will oversee investigation and management of the allegation as follows:

- **Gather information** - children and staff will be spoken to immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the student and so if the academy believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Record information** – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on the academy's child protection and safeguarding file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.

9.8 Where allegations of a sexual nature are made, the academy will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education.

9.9 Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the academy has the following system in place for children to confidently report abuse. See Appendix 4, for routes to disclosure.

9.10 Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken for them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

9.11 Abuse that occurs online or outside of academy will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across several social media platforms that leads to repeat victimisation.

- 9.12 The support required for the student who has been harmed will depend on their particular circumstance and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work.
- 9.13 Support may also be required for the student that caused harm. We will seek to understand why the student acted in this way and consider what support may be required to help the student and/or change behaviours. The consequences for the harm caused or intended will be addressed.
- 9.14 Further information, including the requirements for formal check ins with students following any incidents of child on child abuse are included in the Anti Child on Child Abuse Policy.

10 Serious Violence

- 10.1 All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs organised crime groups.
- 10.2 All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent, having multiple suspensions or being permanently excluded from academy, having experienced maltreatment and having been involved in offending, such as theft or robbery. All concerns are reported immediately to the DSL and recorded in writing.
- 10.3 Concerns about a child carrying a weapon, using a weapon or expressing an intention to use a weapon will be reported immediately to the DSL.

11 Child Criminal & Sexual Exploitation

- 11.1 Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), child trafficking and modern slavery are forms of child abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child for criminal, sexual, financial or other forms of exploitation. Children may be exploited in person or online and may not recognise themselves as victims.
- 11.2 Power imbalance contributing to exploitation can be due to a range of factors, including:
- Age
 - Gender
 - Sexual identity
 - Cognitive ability
 - Physical strength
 - Status
 - Access to economic or other resources
- 11.3 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.
- 11.4 Some children who are criminally or sexually exploited may also be victims of trafficking or modern slavery. Staff should be aware that children may be moved, controlled, coerced or exploited for the benefit of others and may not recognise that they are being abused. Concerns about exploitation, trafficking or modern slavery will be reported immediately to the DSL and

considered for referral to relevant agencies, including the National Referral Mechanism where appropriate.

Child Criminal Exploitation (CCE)

- 11.5 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, organised theft, begging, forced labour, committing vehicle crime, threatening or committing serious violence, or other activity associated with trafficking, modern slavery or criminal exploitation.
- 11.6 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.
- 11.7 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- 11.8 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE Indicators

- 11.9 CCE indicators can include children who:
 - Appear with unexplained gifts or new possessions
 - Associate with other young people involved in exploitation
 - Suffer from changes in emotional well-being
 - Misuse drugs or alcohol
 - Go missing for periods of time or regularly return home late
 - Regularly miss academy or education or do not take part in education

Child Sexual Exploitation (CSE)

- 11.10 CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.
- 11.11 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.
- 11.12 CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- 11.13 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

CSE Indicators

- 11.14 The above indicators can also be indicators of CSE, as can children who:
 - Have older boyfriends
 - Suffer sexually transmitted infections or become pregnant

- 11.15 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.
- 11.16 Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.
- 11.17 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL and recorded in writing. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

12 County Lines

- 12.1 County lines is a form of criminal exploitation where organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.
- 12.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out at paragraph 10.1 of this policy.
- 12.3 Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 10.1 of this policy, with the main indicator being missing episodes from home and/or academy.
- 12.4 Additional specific indicators that may be present where a child is criminally exploited include children who:
- Go missing and are subsequently found in areas away from home
 - Have been the victim or perpetrator of serious violence (e.g. knife crime)
 - Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
 - Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
 - Are found in accommodation with which they have no connection or in a hotel room where there is drug activity
 - Owe a 'debt bond' to their exploiters
 - Have their bank accounts used to facilitate drug dealing.
- 12.5 All staff are aware of indicators that children are at risk from or experiencing this form of criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money. All concerns are reported immediately to the DSL and recorded in writing.

13 Sharing Nudes and Semi-Nudes

- 13.1 Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via facilities such as Bluetooth sharing.
- 13.2 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents including where images commonly known as 'deepfakes' have been created using AI. Alternative terms used by children and young

people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.

13.3 The motivations for creating, taking and sharing nudes and semi-nudes, whether real or AI generated are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. It is important for DSLs to consider incidents on a case by case basis when deciding on follow up actions and referrals

13.4 Incidents may also occur where:

- Children and young people find, copy or share nude or semi-nude images online and falsely claim that the images belong to a peer.
- Children and young people create, alter or manipulate images of another child, including through photo editing tools or artificial intelligence (AI), to produce real or realistic-looking nude or semi-nude images.
- Children and young people share nude or semi-nude images without consent, including forwarding, reposting or distributing images that were originally shared privately.
- Images are used to humiliate, shame, bully, threaten, control or socially exclude a peer.
- Images are bought, sold, exchanged or shared more widely online without the knowledge or consent of the child depicted.
- Children and young people are pressured, manipulated, groomed or coerced into creating or sharing nude or semi-nude images.
- Images are used as part of financially motivated sexual extortion (sextortion), where an individual threatens to share sexual images, videos or information unless money, further images or other demands are met.
- Nude or semi-nude images are created, shared or used in connection with child sexual exploitation, child criminal exploitation, trafficking or other forms of abuse.

13.5 All incidents involving nude, semi-nude or AI generated nude images (Deepfakes) will be managed as follows:

- The incident will be referred to the DSL by the staff member immediately and will be recorded in writing. The DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Staff will not deliberately view any nude or semi-nude images on a child's device.
- Where incidents are not assessed to have been abusive, for example limited to sharing between children consensually and not having been shared further, staff may ask the children to confirm that they have been deleted from their devices and apps.
- If staff have reason to believe that a child has illegal images on their device that are abusive the device may be seized and stored securely for the police to review in line with the DFE Guidance 'Searching, Screening and Confiscation in Schools'.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- Parents and students will be signposted to the NCMEC's Take It Down tool or IWF 'Report Remove' to remove nudes or semi-nudes that may have been shared online
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.
- If staff have reason to believe that a child's device contains illegal images

13.6 The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in March 2024 [Sharing nudes and semi-nudes: advice for education settings](#)

[working with children and young people \(updated March 2024\) - GOV.UK](#) . The academy will have regard to this advice when managing these issues.

14 Online safety

- 14.1 The academy provides online safety education and maintains effective filtering and monitoring systems to help safeguard children from harmful content, unsafe online interactions and online risks.
- 14.2 The DSL has responsibility for filtering and monitoring systems, which are reviewed at least annually and following any significant safeguarding or technological change.
- 14.3 The academy will maintain effective cyber security, filtering and monitoring arrangements in line with the DfE's Digital and Technology Standards and Cyber Security Standards for Schools and Colleges. We will regularly review emerging technologies and online risks, including artificial intelligence, and have regard to relevant DfE guidance to ensure our systems, processes and safeguarding practice remain effective
- 14.4 Parents and carers are provided with information about the academy's approach to online safety, including filtering and monitoring arrangements and how technology is used to support learning safely.
- 14.5 Online safety risks can be categorised into four areas of risk:
- **Content:** being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
 - **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
 - **Conduct:** for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying
 - **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams.
- 14.6 All staff are aware of these risk areas and should report any concerns to the DSL and record them in writing.
- 14.7 Staff recognise that artificial intelligence may create safeguarding risks including AI-generated intimate images, manipulation, misinformation, scams, radicalisation and harmful interactions. Concerns will be managed in line with this policy.
- 14.8 Mobile phones and other personal internet-enabled devices can present safeguarding risks, including access to harmful content, online abuse, cyberbullying, sexual harassment, the creation or sharing of nude or semi-nude images, AI-generated imagery, contact with individuals who may pose a risk to children as well as distraction from learning. The academy will manage these risks through education, supervision, filtering and monitoring arrangements, and the implementation of appropriate behaviour and mobile phone procedures. A separate Mobile Free Academy (Students) Policy supports this.
- 14.9 Further information about Online Safety including the Acceptable Use Policy can be found in our ICT Policy.

15 Mobile Devices

- 15.1 The Trust maintains clear procedures regarding the use of mobile phones, cameras and other personal devices by staff, visitors and pupils. These arrangements are designed to safeguard children, protect privacy and reduce the risk of online harm, inappropriate contact, image sharing and misuse of technology.
- 15.2 Staff will only use personal devices in accordance with Trust procedures. Images or recordings of children will only be created, stored or shared using approved systems and in line with data protection requirements.

16 Domestic Abuse

- 16.1 The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.
- 16.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.
- 16.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.
- 16.4 Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- 16.5 Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the academy has up to date safeguarding information about the child.
- 16.6 All staff are aware of the impact domestic violence can have on a child and that a child who witnesses domestic abuse is also considered to be a victim. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL and record them in writing.

17 Honour-Based abuse

- 17.1 So-called 'honour-based' abuse (HBA) encompasses actions taken 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.
- 17.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.
- 17.3 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead and record their concerns in writing.

Female Genital Mutilation

- 17.4 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.
- 17.5 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the Designated Safeguarding Lead and record their concerns in writing. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the Designated Safeguarding Lead.

Forced Marriage

- 17.6 A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse. Forced marriage is illegal.
- 17.7 Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial “marriages” as well as legal marriages.
- 17.8 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.
- 17.9 Forced marriage is not the same as arranged marriage, which is common in many cultures.
- 17.10 If staff are concerned that a child may be at risk of forced marriage, they should speak to the Designated Safeguarding Lead and record their concern in writing.

18 Radicalisation and Extremism

- 18.1 Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process of legitimising support for, or use of terrorist violence.
- 18.2 Children can be susceptible to extremist ideologies and radicalisation. Extremism can take many forms and may be linked to political, religious, ideological or single-issue beliefs, including Islamist extremism, extreme right-wing ideologies, antisemitism and other forms of hateful extremism. Staff are trained to recognise indicators of radicalisation and take appropriate safeguarding action where concerns arise.
- 18.3 Prevent Duty training should be updated regularly and at least every two years in all of our Academies.
- 18.4 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the Designated Safeguarding Lead and record their concern in writing.

19 Staff/Student Relationships

- 19.1 Staff are aware that inappropriate behaviour towards students is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a student under the age of 18.
- 19.2 Staff are trained to recognise adult behaviour that constitutes both a low-level concern and a harm test passing concern in line with KCSIE as part of their core level 1 training.

- 19.3 We provide our staff with advice regarding their personal online activity and we have clear rules regarding electronic communications and online contact with students. It is considered a serious disciplinary issue if staff breach these rules.
- 19.4 Our Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.
- 19.5 Allegations made against staff will be dealt with in line with our Staff Conduct Concerns Policy.

20 Safeguarding Concerns and Allegations Made About Staff, Supply Staff, Contractors, Volunteers and Trainee Teachers

- 20.1 Safeguarding concerns, low-level concerns and allegations relating to staff, supply staff, contractors, volunteers or trainee teachers will be managed in accordance with the Trust's Staff Safeguarding Conduct Concerns Policy. Procedures are informed by Part Four of Keeping Children Safe in Education and set out the requirements for reporting, managing and recording concerns and allegations.
- 20.2 Safeguarding concerns or allegations made about staff who no longer work at the academy will be reported to the police.

21 Whistle Blowing if You Have Concerns About a Colleague

- 21.1 It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the Principal unless the complaint is about the Principal, in which case concerns should be reported to the Director of Safeguarding and Inclusion or the Head of Governance and Assurance.
- 21.2 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.
- 21.3 The Whistleblowing Policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

22 Staff and Governor/Trustee Training

- 22.1 Our staff receive appropriate safeguarding and child protection training which is regularly updated through an annual KCSIE update and regular training sessions as well as bulletins throughout the year. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our students.
- 22.2 New staff and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding Policy and our staff Code of Conduct, how to report and record concerns and information about our Designated Safeguarding Lead and Deputy DSLs.
- 22.3 Our governors/trustees receive appropriate safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

- 22.4 Our safeguarding governor/trustee receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high-quality safeguarding across the trust.

23 Safer Recruitment

- 23.1 The Trust is committed to safer recruitment and adopts recruitment procedures that help to deter, identify and reject people who may present a risk to children. All recruitment, selection and pre-employment checks are carried out in accordance with Keeping Children Safe in Education, including verification of identity, qualifications, employment history, references, right to work, prohibition, disqualification and criminal record checks, as applicable to the role. Online searches may also be undertaken as part of the recruitment process in line with Trust procedures.
- 23.2 All relevant staff working in early years provision and/or in before and after school childcare for children under the age of eight are made aware of the requirements of the Disqualification under the Childcare Act guidance and their duty to disclose any information that may affect their suitability to work in such settings.
- 23.3 Volunteers, contractors and other adults working within the academy are subject to appropriate risk assessment, supervision and safeguarding checks in accordance with Keeping Children Safe in Education. The academy verifies the identity of all contractors and obtains DBS and other suitability checks where required. Adults who have not undergone appropriate checks will not be permitted to work unsupervised with children.
- 23.4 When engaging supply staff, the academy will obtain written confirmation from the supplying agency or organisation that all required safer recruitment and pre-employment checks have been completed and that individuals are suitable to work with children. Trainee teachers will be checked either by the academy or by the initial teacher training provider, and written confirmation of the required checks will be obtained where these have been undertaken by the provider.
- 23.5 The Trust maintains a Single Central Record of the required recruitment and vetting checks for staff, governors, trustees, trainee teachers, supply staff and others, as required by Keeping Children Safe in Education. Further information is set out in the Trust's Recruitment Policy and associated procedures.

24 Site Security

- 24.1 Visitors are asked to sign in at the academy reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with a green lanyard and given unescorted access to the academy site. Visitors who have not undergone the required checks will be provided with a red lanyard and be escorted at all times.
- 24.2 Details of procedures for visitors including protocols for guest speakers can be found in the Visitors Procedure.

25 Child Protection Procedures

Recognising abuse

- 25.1 Abuse, neglect and exploitation are forms of maltreatment. Somebody may abuse, exploit or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

- 25.2 Keeping Children Safe in Education refers to the categories of abuse. These are set out at Appendix One along with indicators of abuse.

Taking action

- 25.3 Any child could become a victim of abuse. Key points for staff to remember for taking action are:
- In an emergency take the action necessary to help the child, if necessary call 999
 - Report your concern to the DSL as soon as possible and immediately if there is an immediate risk of harm. Record the concern in writing on CPOMs or a paper copy of the concern form if CPOMs is not available to you.
 - Share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family

If you are concerned about a student's welfare

- 25.4 Staff may suspect that a student may be at risk. This may be because the student's behaviour has changed, their appearance has changed or physical signs are noticed. In these circumstances, staff will give the student the opportunity to talk and ask if they are OK.
- 25.5 If the student does reveal that they are being harmed, staff should follow the advice below.
- Staff are aware that children may experience barriers to disclosure such as not feeling ready or knowing how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or may be being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having professional curiosity, speaking to the DSL and recording their concerns in writing if they are worried about a child.

If a student discloses to you

- 25.6 If a student tells a member of staff about a risk to their safety or wellbeing, the staff member will:
- Remain calm and not overreact
 - Allow them to speak freely
 - Not be afraid of silences
 - Not ask investigative questions
 - Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
 - Not automatically offer physical touch as comfort
 - Let the student know that in order to help them they must pass the information on to the DSL
 - Tell the student what will happen next
 - Alert the DSL immediately if there is an imminent risk of harm
 - Record the concern on CPOMS as soon as possible
 - Report verbally to the DSL even if the child has promised to do it by themselves

Notifying parents

- 25.7 The academy will normally seek to discuss any concerns about a student with their parents or carers. If the academy believes that notifying parents could increase the risk to the child or

exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

26 Mandatory Reporting of Child Sexual Abuse

- 26.1 Staff must be aware of the legal duty introduced through the Crime and Policing Act to report disclosures of child sexual abuse in certain circumstances. Where a child makes a direct disclosure of sexual abuse.
- 26.2 Staff will follow academy safeguarding procedures immediately and report the concern to the DSL without delay. The DSL will ensure that any statutory reporting requirements are met in accordance with current legislation and guidance.

27 Referral to Children's Social Care

- 27.1 The DSL will make a referral to children's social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- 27.2 Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the Principal or the chair of governors are not available and a referral is required immediately. Contact details are listed in section 3 of this policy.

28 PACE Code C (Police and Criminal Evidence Act (1984) – Code C)

- 28.1 The Principal, DSL and deputy (DDSL) are aware of the requirement for children to have an appropriate adult when in contact with Police officers.
- 28.2 The 'appropriate adult' means, in the case of a child:
 - The parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
 - A social worker of a local authority
 - If these are unavailable, another responsible adult aged 18 or over who is not:
 - A police officer
 - Employed by the police
 - Under the direction or control of the chief officer of a police force
 - A person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.
- 28.3 The DSL will ensure that this requirement is explained to staff as part of annual training.
- 28.4 The DSL will ensure that, should the police attend the Academy site to interview a student in respect of an allegation that parents/carers are contacted and given the opportunity to attend site as the appropriate adult. Should this not be the case a trained member of the Academy staff should undertake this role until the police can provide an appropriate adult.
- 28.5 The Principal, DSL or Deputy DSL will seek to ensure that interviews take place in police custody, away from the Academy so that the Academy remains a safe space for the young person.

29 Confidentiality and Sharing Information

- 29.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead or Deputy DSL, Principal or Chair of Governors.

Sharing information

- The DSL will normally obtain consent from the student and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for deciding to do so.
- Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.
- Information sharing decisions will be recorded, whether or not the decision is taken to share.
- The UK GDPR and the Data Protection Act 2018 do not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Trust's Data Protection Officer.

Storing information

- Child protection information will be stored separately from the student's academy file within our CPOMS system where information will be appropriately categorised. It will be stored and handled in line with our Record Management, Retention and Disposal Policy.
- Our Data Protection Policy and our Record Management, Retention and Disposal Policy are available to parents and students on request and can also be found on our website.

30 Special Circumstances

Looked after children

- 30.1 The most common reason for children becoming looked after is as a result of abuse or neglect. The academy ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The Designated Teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's Virtual Headteacher for children in care. The Virtual Academy Headteacher is a strategic leader, who promotes the educational outcomes of children with a social worker or in Kinship Care.

Children who have a social worker

- 30.2 Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

Young Carers

- 30.3 A young carer is a child who provides, or intends to provide, care for another person. Caring responsibilities may arise as a result of physical or mental illness, disability, substance misuse or other circumstances affecting a family member.
- 30.4 Young carers may face additional challenges that can affect their wellbeing, attendance, attainment, social development and mental health. The academy recognises that young carers may require additional support and that their caring responsibilities may be an indicator that further help is needed for the child or family.
- 30.5 Where a child is identified as a young carer, the academy will work with the child, their family and other relevant agencies, where appropriate, to understand their needs and provide support. Staff will remain alert to safeguarding concerns and will report any concerns in accordance with this policy.

Work Experience

- 30.6 The academy has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with statutory guidance.

Children staying with host families

- 30.7 The academy may make arrangements for students to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the statutory guidance to ensure hosting arrangements are as safe as possible.
- 30.8 Academies cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where students stay with host families abroad we will agree with the partner academies a shared understanding of the safeguarding arrangements. Our Designated Safeguarding Lead will ensure the arrangements are sufficient to safeguard our students and will include ensuring students understand who to contact should an emergency occur or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.
- 30.9 Some overseas students may reside with host families during academy terms and we will work with the local authority to check that such arrangements are safe and suitable.

Private fostering arrangements

- 30.10 A private fostering arrangement occurs when someone other than a parent or a close relative, cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.
- 30.11 Where a member of staff becomes aware that a student may be in a private fostering arrangement they will tell the DSL and the academy will notify the local authority of the circumstances

Appendix One - Four Categories of Abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead. It is the responsibility of staff to report their concerns.

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

Physical abuse

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

Indicators of physical abuse

The following may be indicators of physical abuse:

- have bruises, bleeding, burns, bites, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- An injury that is not consistent with the account given
- Symptoms of drug or alcohol intoxication or poisoning
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

Emotional abuse

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

Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes themselves in negative ways
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Inappropriate emotional responses, fantasies

- Self-harm
- drug or solvent abuse
- Running away
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis (urinary incontinence)

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Aggressive behaviour including sexual harassment or molestation
- Reluctance to undress for PE or swimming
- Anal or vaginal discharge, soreness or scratching
- Bruises or scratches in the genital area
- Reluctance to go home
- Refusal to communicate
- Depression or withdrawal
- isolation from peer group
- Eating disorders, for example anorexia nervosa and bulimia
- self-harm
- substance abuse
- acquire gifts such as money or a mobile phone from new 'friends'

Neglect

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

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

Indicators of neglect

The following may be indicators of neglect:

- constant hunger or stealing, scavenging and/or hoarding food

- frequent tiredness
- frequently dirty or unkempt
- poor attendance or often late
- poor concentration
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones or to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is left at home alone or with inappropriate carers

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse

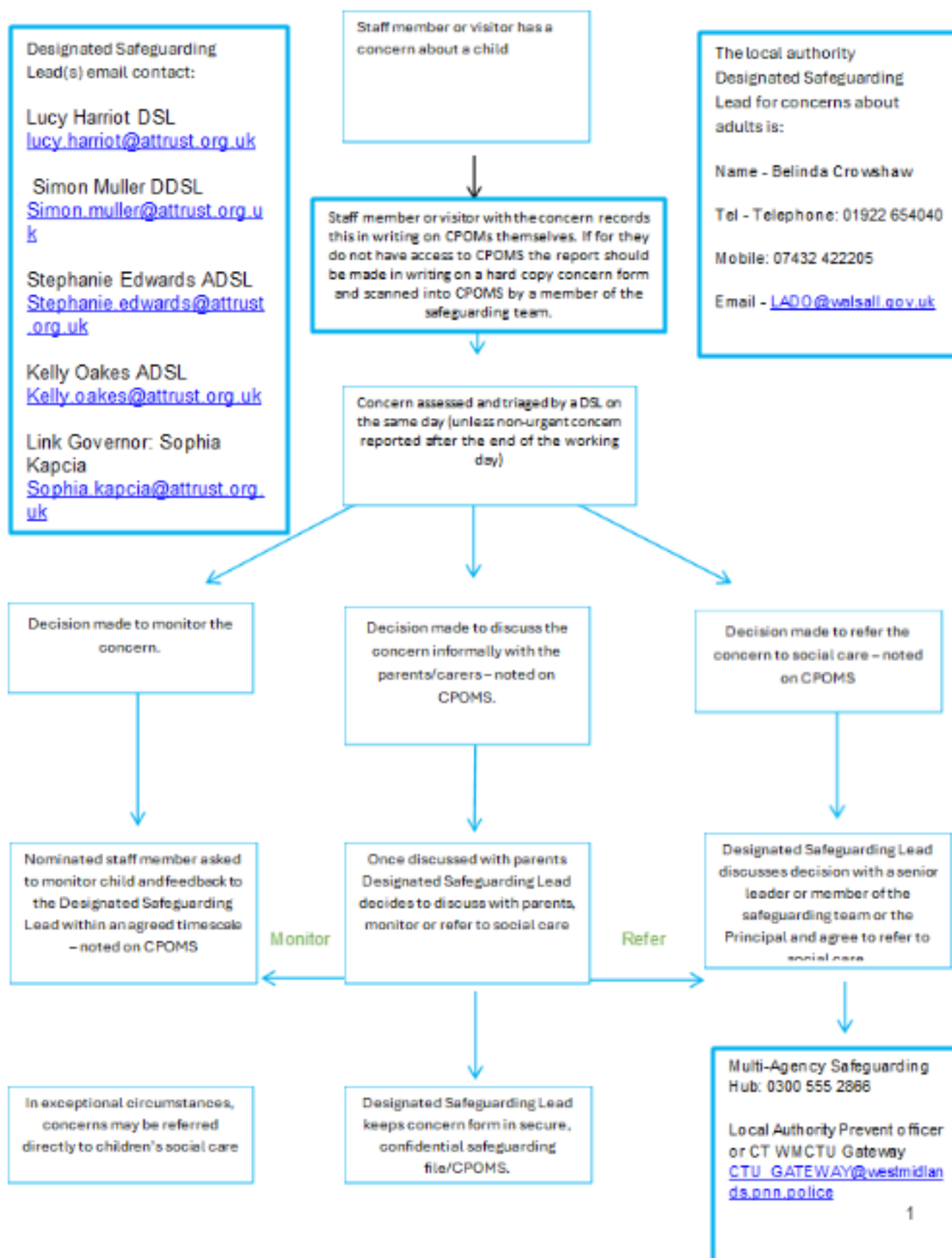
Appendix Two - Related Safeguarding Policies

- Staff code of conduct
- Use of Restrictive Intervention and Reasonable Force Policy
- Behaviour Policy
- Personal and intimate care
- Complaints Procedure
- Anti Child on Child Abuse and Bullying Policy
- Home Visits Policy
- Whistleblowing Policy
- SEND Policy
- Attendance Policy
- Recruitment and selection
- Staff Conduct Concerns
- Staff Disciplinary Policy
- ICT Policy (Including Acceptable Use Agreement)
- Data Protection Policy
- Exclusions Policy
- Visitors Policy
- Medical Conditions Policy
- Educational Visits Policy
- Mobile Free Academy (Students) Policy
- Allergies Policy

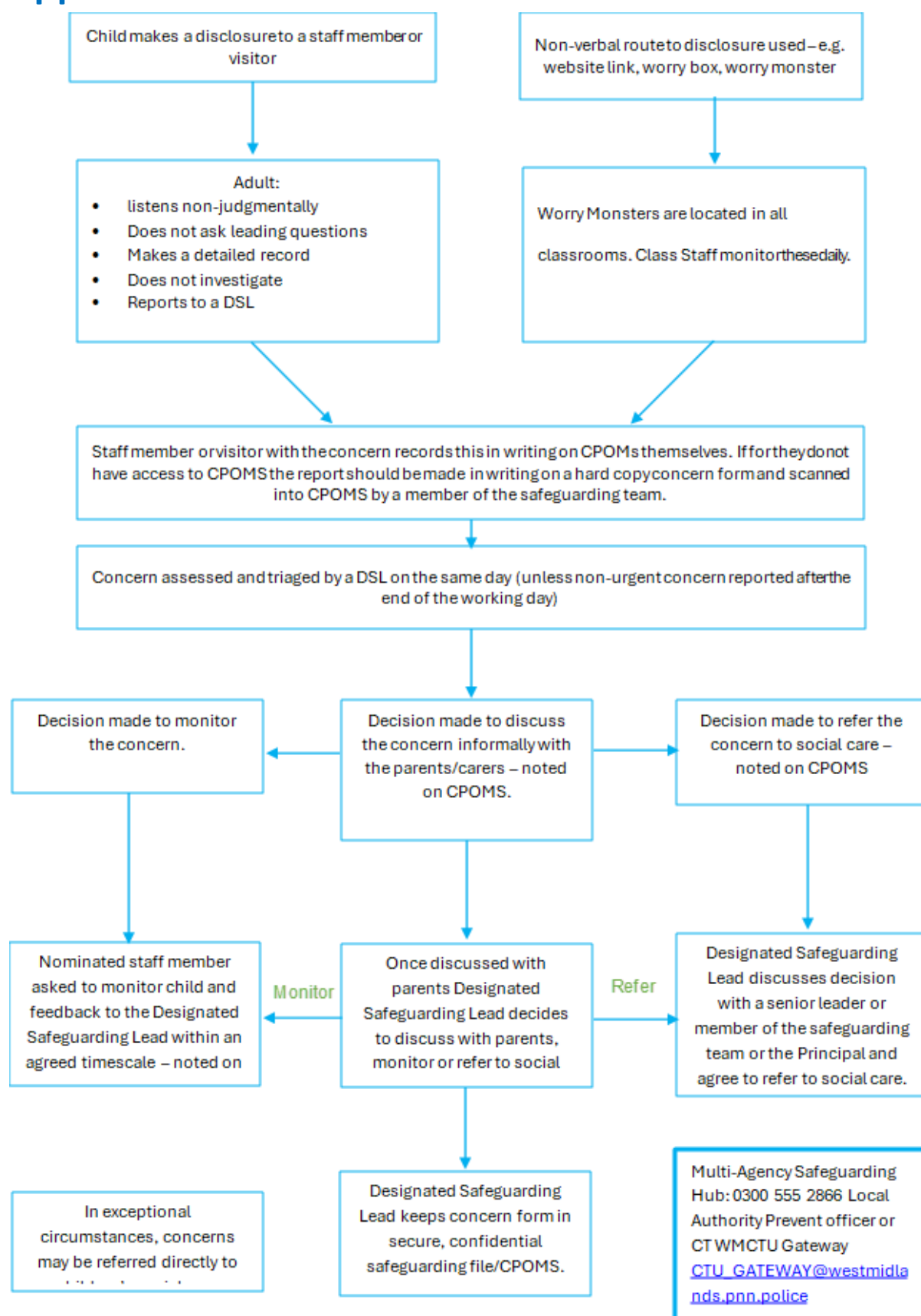
Appendix Three – Localised Safeguarding Top 5

	Localised Safeguarding Concerns	Our strategic academy response – what we do to prevent or reduce harm and respond to harm if it occurs.
1	Mental Health	Mental health Lead identified within the Academy Localised Mental Health strategy in each place including graduated response and multi-agency work TAC meetings focus on understanding and supporting barriers to learning including mental health Entire provision is based around the support of mental health needs CPD for all staff Close work with CAMHS (accompany families to appointments) Liaise with external agencies as required Art therapist available in school Celebration/ self-esteem of pupils = assemblies, individualised intervention around this area of need Core values = reflect the therapeutic provision offered Staff mental health and wellbeing supported by – Mental Health First Aider, close staff team, Wellbeing Champions in school (activities and initiatives) Close work with FIW and parent support groups
2	Attendance	Positive culture of attendance Early identification systems implemented for patterns of poor attendance Strong relationships built with families through regular communication and home visits (Class DOJO) Flexible support plans offered, including staggered starts and transport assistance Conduct multi-agency meetings (e.g., EHA, CIN) when thresholds are met Use attendance panels and formal letters to escalate concerns – termly attendance review with Local Authority Provide targeted interventions Part-time timetables used strategically to support integration into school
3	Emotional Dysregulation and Aggressive Behaviour	Robust behaviour data monitoring system in place – early identification of patterns etc Trauma-informed approaches embedded across the school. Staff trained in de-escalation and positive behaviour support strategies (TEAM TEACH/ Emotion Coaching) Individualised regulation plans and sensory regulation tools Regular TAC meetings for children “flagging” Risk assessments and safety plans following major incidents Involve external agencies (e.g., CAMHS, EP) for specialist input Restorative practice sessions post-incident
4	Neglect	High area of concern as identified in Walsall Authority DSL Training = including recognising signs, referrals, support, neglect as a hidden harm and affluent neglect Staff awareness including recording all concerns no matter how small Trauma informed practice training in all academies Support in school = breakfast club and uniform Poverty proofing all events and activities (ATT policy around this)
5	Peer Relationships and Prejudice-Related Incidents	We proactively promote respectful relationships, inclusion and equality through our curriculum, therapeutic approach, behaviour support systems and positive role modelling. We work to prevent harm by teaching pupils about diversity, protected characteristics, empathy, conflict resolution and appropriate communication. Staff are trained to identify and challenge prejudice-related language, discriminatory behaviour and unhealthy peer dynamics at the earliest opportunity. Where incidents occur, we respond promptly through restorative practice, targeted intervention, safeguarding processes and individualised support plans. We investigate concerns, assess risk, support those affected, address the behaviour of those causing harm, engage families where appropriate, and monitor outcomes to reduce the likelihood of recurrence. This ensures that all pupils feel safe, respected and able to thrive within our academy community.

Appendix Four - Reporting Flowchart



Appendix Five - Routes to Disclosure Flowchart



Appendix Six - Contact Details of Key Staff and Agencies

Title	Name	Contact Details	
Designated Safeguarding Lead (DSL)	Lucy Harriot	Email	Lucy.harriot@attrust.org.uk
		Telephone	01922 712834
Deputy Designated Safeguarding Lead (DDSL)	Simon Muller	Email	Simon.muller@attrust.org.uk
		Telephone	01922 712834
Principal	Elyse Phillips	Email	Elyse.phillips@attrust.org.uk
		Telephone	01922 712834
Safeguarding Governor	Matt Spence	Email	Matt.spence@attrust.org.uk
		Telephone	01922 712834
Chair of Governors	Matt Spence	Email	Matt.spence@attrust.org.uk
		Telephone	01922 712834
Academy Attendance Lead	Lucy Harriot	Email	Lucy.dawes@attrust.org.uk
		Telephone	01922 712834
Attendance Officer	Nicola Harris	Email	Nicola.harris@attrust.org.uk
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Local Arrangements			
Local Children's Safeguarding Partnership	Head of Safeguarding Partnership = Sian Jones	Contact details	Sian.jones@walsall.gov Office: 01922 652867 Mobile: 07707152309
Children's Social Care	MASH	Contact details	MASH@walsall.gov.uk 0300 555 2866 Evenings, weekends and bank holidays 0300 555 2922 or 0300 555 2836
Local Authority Designated Officer (LADO)	Belinda Crowshaw	Contact details	Tel - Telephone: 01922 654040 Mobile: 07432 422205 Email - LADO@walsall.gov.uk

