

HORIZONS EDUCATION TRUST

Child Protection & Safeguarding Policy

September 2026

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1.0 SAFEGUARDING FLOWCHART

If you have a safeguarding concern:

Step	Action	Expectation
1	Ensure immediate safety	Provide reassurance, first aid or emergency support. Do not promise confidentiality.
2	Tell the Designated Safeguarding Lead or Deputy Lead - DSL/DDSL	Report immediately to the DSL, DDSL or Headteacher if the DSL/DDSL is unavailable.
3	Record on MyConcern	Record all concerns on MyConcern as soon as possible and on the same day. Include the pupil voice, whether expressed verbally, through behaviour, presentation or another preferred method of communication.
4	DSL triage	The DSL will assess the concern, consider thresholds, and decide what action or support is needed.
5	Parents/Carer	The DSL will normally contact parents/carers unless doing so would increase risk, compromise an investigation or place another person at risk.
6	External referral	The DSL / headteacher will refer as appropriate to Children's Social Care, Police, LADO, Prevent/Channel or other relevant agencies.
7	Staff allegation or serious incident	Where the concern involves a staff allegation, injury to a pupil or staff member, restrictive intervention concern or other serious incident, the Headteacher/DSL will inform the Director of Safeguarding and Attendance in line with Trust procedures. If they are not available the contact should be made with the Director of Education or CEO. Staff allegation details must not be recorded on the pupil's MyConcern profile.
8	Record outcome and review	The DSL records actions, decisions, rationale and outcomes on MyConcern and keeps the case under review until risks are reduced and support is effective.

2.0 INTRODUCTION

The word parent is used throughout this policy to refer to a parent, carer or guardian. The word pupil is used throughout to refer to children and young people on roll at the academy. Where statutory guidance uses the word child, this includes all pupils under the age of 18.

Horizons Education Trust (HEdT) is committed to safeguarding and promoting the welfare of pupils and expects everyone who works for, or on behalf of, the Trust to share this commitment.

Safeguarding is everyone's responsibility. All staff, governors, trustees, volunteers, contractors, agency staff, supply staff, trainee teachers and visitors are expected to play their full part in keeping pupils safe.

This policy has been authorised by HEdT. It is published on the Trust and/or academy website and is available in hard copy to parents on request.

This policy applies wherever staff or volunteers are working with pupils, including on academy premises, during off-site activities, educational visits, residential visits, alternative provision, transport-related arrangements and any academy-led activity beyond normal academy hours.

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

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

Every pupil should feel safe and protected from any form of harm, abuse, neglect or exploitation.

HEdT will always act in the best interests of the pupil and will ensure that pupils are listened to, believed, supported and kept safe.

This policy must be read and applied alongside *Keeping Children Safe in Education* and *Working Together to Safeguard Children*. It provides the Trust's safeguarding arrangements but does not replace or reproduce all requirements contained in statutory guidance. Staff, leaders, governors and trustees must refer directly to the current statutory guidance when carrying out their safeguarding responsibilities and when responding to individual cases. Where statutory guidance is updated, the most recent version will take precedence.

3.0 PURPOSE, SCOPE & PRINCIPLES

The purpose of this policy is to provide a clear framework for safeguarding and child protection across HEdT academies. It sets out what staff must do when they are worried about a pupil, how concerns are recorded and escalated, and how leaders assure themselves that safeguarding arrangements are effective in practice.

3.1 Our Safeguarding principles

- Safeguarding is everyone's responsibility.



- The welfare of the pupil is paramount.
- All staff must maintain an attitude of “it could happen here”.
- Concerns must be reported immediately and recorded on MyConcern on the same day.
- Pupils must be listened to and their wishes and feelings considered, including where pupils communicate non-verbally, through behaviour or through alternative communication systems.
- Staff must not investigate concerns themselves; they must record, report and follow the direction of the DSL and/or external agencies.
- Safeguarding decisions must be recorded clearly, including the rationale for actions taken or not taken.
- The Trust will work constructively with parents, local authorities, safeguarding partners, health, police and other agencies to keep pupils safe.

3.2 Definition of Child Protection

Child protection is the activity undertaken to protect individual pupils who are suffering, or are likely to suffer, significant harm. Child protection is part of safeguarding but is distinct from the wider work of promoting welfare and preventing harm.

3.3 Special School Context

HEdT academies educate pupils with a wide range of special educational needs and disabilities. Leaders and staff recognise that some pupils may have additional barriers to recognising, communicating or reporting abuse, neglect or exploitation. Staff **must not** assume that changes in behaviour, communication, emotional regulation, attendance, presentation, personal care needs or engagement are solely linked to a pupil’s disability or diagnosis. Such changes may indicate unmet need, harm, distress, abuse or exploitation and must be considered through a safeguarding lens.

3.4 SEND-Informed Safeguarding Practice

Safeguarding practice will be person-centred, accessible, developmentally informed and based on each pupil’s individual profile rather than chronological age alone. Staff will use EHCPs, communication passports, sensory profiles, health and intimate care plans, positive behaviour support plans and risk assessments to understand what is usual for the pupil and identify meaningful change.

The Trust recognises that pupils with SEND can face additional safeguarding barriers, including assumptions that indicators of abuse relate to disability; being more prone to peer group isolation or bullying; difficulties reporting or understanding harm; cognitive, sensory or communication barriers; dependence on adults for personal care, medication, transport or physical support; and a disproportionate impact from behaviours such as bullying without outward signs.

Staff must not assume that changes in a pupil’s behaviour or wellbeing are simply linked to their SEND, disability or diagnosis. Any changes in a pupil’s behaviour, regulation, communication, sleep, eating, continence, mobility, signs of pain, self-injury, attendance, engagement, tolerance of personal care or relationship with a particular person must be explored. Staff should remain professionally curious and report any safeguarding concerns.

Staff must actively seek the pupil’s views using their preferred way of communicating. This may include speech, signing, symbols, communication boards, eye gaze, objects of reference, photographs, drawing, behaviour, observation over time or support from someone who knows the pupil’s communication well.

A pupil's inability to make a verbal disclosure must never be taken as evidence that harm has not occurred.

Safeguarding responses must be adapted to meet the pupil's needs. Communication aids, sensory tools and trusted support should remain in place wherever possible. The DSL should work with relevant professionals and the family while maintaining professional curiosity.

3.5 Early Years Provision

This policy applies to children receiving early years education within the Trust. In accordance with Keeping Children Safe in Education 2026, the Trust will read and implement this policy alongside Section 3 of the statutory framework for the Early Years Foundation Stage.

The academy will ensure that:

- early years children are adequately supervised and are usually within sight and hearing of staff and always within sight or hearing;
- safeguarding arrangements reflect the age, developmental stage, communication needs and vulnerability of each child;
- early years staff receive safeguarding training appropriate to children aged 0–5, meeting the criteria in Annex C of the EYFS statutory framework, renewed at least every two years;
- appropriate arrangements are in place for staff induction, supervision, paediatric first aid, intimate care and toileting, medicines, allergies, safer eating, accidents, educational visits and the safe collection of children;
- absences are followed up promptly, including contact with parents or carers and alternative emergency contacts where necessary. Patterns of absence will be considered in the context of the child's vulnerability and family circumstances, with referrals made to Children's Social Care or the police where appropriate;
- only Trust-approved devices are used to photograph or record children, in accordance with this policy; and
- the academy has regard to statutory guidance concerning children's screen use in early years settings.

Where an academy operates an after-school club, safeguarding arrangements within this policy apply throughout the provision. Where the club includes children of reception age, the safeguarding and welfare requirements in Section 3 of the EYFS statutory framework will apply. Children will be adequately supervised, attendance and collection arrangements will be recorded, and children will only be released to individuals authorised by their parent or carer.

4.0 ROLES & RESPONSIBILITIES

4.1 All Staff, Volunteers & Trustees have a responsibility for:

- providing a safe environment in which pupils can learn and develop;
- identifying pupils who may need help, support or protection;
- taking appropriate action and working with other services where required;
- knowing the role and identity of the DSL and DDSs;
- understanding and following academy systems that support safeguarding, including this policy, the Staff Code of Conduct, Behaviour Policy, Online Safety Policy and Whistleblowing Policy;



- receiving and applying safeguarding and child protection training, including online safety, filtering and monitoring responsibilities and emerging digital risks;
- supporting social workers and other professionals to make decisions about individual pupils when required;
- raising any concern about a pupil immediately with the DSL/DDSL and recording it on MyConcern on the same day;
- raising concerns about adults working with pupils immediately in line with section 14 of this policy; and
- acting in the best interests of pupils at all times.

4.2 Specifically, All Academy staff are responsible for:

- knowing how to report and record concerns on MyConcern;
- ensuring MyConcern records are comprehensive, clear, factual, accurate and professionally written accounts that will stand up to scrutiny;
- recording the pupil voice, including views expressed verbally, non-verbally, through behaviour, communication aids, drawings or other preferred communication methods;
- being alert to signs of abuse, neglect, exploitation, radicalisation and online harm;
- understanding that pupils may not recognise their experiences as harmful or may not feel ready or able to tell an adult;
- listening to, and seeking out, the views, wishes and feelings of pupils;
- knowing academy procedures for child-on-child abuse, sexual harassment, sexual violence and harmful sexual behaviour;
- knowing academy procedures for children absent from education, pupils missing education and repeated or prolonged absence;
- following MyConcern backup procedures if MyConcern is temporarily unavailable; and
- reporting concerns about another member of staff to the Headteacher, or concerns about the Headteacher to the CEO and Director of Safeguarding and Attendance.

4.3 Governors, Trustees & Leaders are responsible for:

- reading, understanding and applying the latest version of Keeping Children Safe in Education and Working Together to Safeguard Children;
- ensuring the academy has an effective safeguarding and child protection policy, Staff Code of Conduct, Behaviour Policy, Online Safety Policy and Managing Allegations/Low-Level Concerns procedures;
- ensuring all staff are given a safeguarding induction which includes online safety, MyConcern, reporting procedures and the response to concerns about adults;
- ensuring the DSL is a senior member of staff with appropriate status, authority, time, funding, resources and support;
- ensuring arrangements are in place for appropriate filtering and monitoring, with clear responsibility, review and reporting;
- ensuring governors/ trustees receive safeguarding and child protection training, including online safety, filtering and monitoring and cyber security, at induction and at least annually;
- maintaining strategic oversight of safeguarding through reports, visits, checks, MyConcern dip-sampling, SCR checks, training data, filtering and monitoring assurance, alternative provision assurance and attendance data;
- ensuring policies and procedures are understood and followed in practice; and
- ensuring the Trust and Academy respond to learning from safeguarding incidents, audits, complaints, whistleblowing, LADO consultations and external reviews.

4.4 The Headteacher is responsible for:

- ensuring this policy and associated safeguarding procedures are implemented consistently;
- ensuring staff are informed of safeguarding systems at induction and through regular updates;
- ensuring all staff, including those who do not work directly with pupils, are provided with, read and understand Part One of KCSIE 2026. The DfE Part One overview is a complementary quick reference and does not replace Part One;
- ensuring that concerns and allegations about adults are managed in line with Trust procedures and LADO advice;
- ensuring the DSL/DDSLs have sufficient time, training, authority, resources and support;
- ensuring appropriate DSL cover during the academy day, outside normal hours and during out-of-term academy activities;
- ensuring safeguarding due diligence is completed before commissioning alternative provision or external provision;
- ensuring the academy has appropriate arrangements for filtering and monitoring and that effectiveness is reviewed at least annually;
- ensuring staff feel able to raise concerns about poor or unsafe practice and are supported to do so;
- ensuring referrals are made to the DBS and Teaching Regulation Agency where statutory criteria are met; and
- providing governors, trustees and the Trust with sufficient information to scrutinise safeguarding effectiveness.

4.5 The DSL & DDSLs

The Designated Safeguarding Lead (DSL) retains overall lead responsibility for safeguarding and child protection. Deputy Designated Safeguarding Leads (DDSLs) support the DSL and may carry out any of the responsibilities set out below. When the DSL is unavailable, the Headteacher will inform a DDSL that they are required to act as DSL. The acting DSL must ensure that concerns, referrals and safeguarding decisions are addressed without delay.

Responsibilities of DSL & DDSLs:

- taking lead responsibility for safeguarding and child protection, including online safety and understanding filtering and monitoring arrangements;
- being available during academy hours, and ensuring appropriate arrangements are in place for cover during absence and academy activities outside normal hours;
- managing, reviewing and triaging MyConcern referrals and ensuring actions, decisions, rationale and outcomes are recorded clearly;
- making or supporting referrals to Children's Social Care, police, Prevent/Channel, the LADO, DBS or other agencies as appropriate;
- working with attendance staff to identify safeguarding concerns linked to repeated or prolonged absence, part-time timetables, suspension, exclusion or missing education;
- keeping safeguarding cases under review and escalating concerns where risk increases or support is not effective;
- ensuring child protection records are transferred securely within five days of an in-year transfer or within the first five days of the start of a new term;
- sharing relevant safeguarding information with receiving schools in advance where needed to safeguard the pupil or others;

- liaising with the Headteacher, SENCO, attendance staff, pastoral staff, IT staff, senior mental health lead, designated teacher, social workers and other professionals so that pupil needs are considered holistically;
- taking lead responsibility for promoting educational outcomes for pupils who have, or have had, a social worker;
- ensuring staff understand local thresholds, Family Help, section 17 children-in-need and section 47 child protection processes;
- ensuring pupils are taught how to recognise risk, seek help and report concerns through the curriculum and wider safeguarding culture;
- providing termly anonymised safeguarding reports to the Headteacher and governing body;
- ensuring support is available for staff involved in difficult safeguarding cases; and
- ensuring the policy is reviewed at least annually and updated in response to statutory guidance, local arrangements and lessons learned.

5.0 SAFEGUARDING PROCESSES & PROCEDURES

5.1 How to Report Concerns

- All safeguarding and child protection concerns must be reported to the DSL or DDSL immediately.
- All concerns must be recorded on MyConcern as soon as possible and always on the same day.
- Staff should never wait until the next day to record or report a safeguarding concern.
- If a pupil is at immediate risk, staff must first secure the pupil's safety, seek emergency help if required and alert the DSL/DDSL or Headteacher immediately.
- If MyConcern is temporarily unavailable, the academy backup paper procedure must be followed. The record must be uploaded to MyConcern as soon as the system is available.
- Failure to follow reporting procedures may result in disciplinary action.

5.2 Taking Action

Where a pupil has suffered significant harm, or is likely to do so, the DSL/DDSL will make an immediate referral to Children's Social Care and/or the police. In an emergency, any staff member should call 999. The child protection process must not delay first aid or emergency medical assistance.

Where the DSL/DDSL is unavailable and a member of staff believes a pupil is at risk of significant harm, the staff member must make direct referral to Children's Social Care or the police and inform the DSL or Headteacher as soon as possible.

5.3 Disclosures of Abuse, Neglect or Exploitation

If a pupil talks, signs, writes, draws, communicates through behaviour or uses their preferred method of communication to share information about risk, harm, abuse, neglect or exploitation, staff must respond calmly and listen carefully.

- Do not promise confidentiality.
- Do not ask investigative or leading questions.
- Reassure the pupil that they have done the right thing by telling someone.
- Explain, in a way the pupil can understand, what will happen next.
- Record the disclosure on MyConcern as soon as possible and on the same day.



- Use the pupil's own words where possible and record observations factually.
- Include the pupil voice and any non-verbal indicators or communication support used.
- Do not discuss the disclosure with colleagues, friends or family unless necessary for safeguarding.

5.4 Suspecting a Pupil Is At Risk

There may be occasions where staff are worried about a pupil but have no direct disclosure or clear evidence. Staff must record these early concerns on MyConcern and speak to the DSL/DDSL. Early recording allows patterns to be identified and helps the academy respond before risk escalates.

5.5 Notifying Parents

The academy will normally seek to discuss concerns with parents. The DSL or a member of the safeguarding team will make contact with parents where appropriate. However, if informing parents may increase risk to the pupil, place another person at risk, compromise a police or social care investigation, or undermine safeguarding action, advice will first be sought from Children's Social Care and/or the police.

5.6 Referrals to Children's Social Care

The DSL/DDSL will make a referral to Children's Social Care if it is believed that a pupil is suffering, or is likely to suffer, significant harm, or where the threshold for statutory support is met. The pupil, taking account of their age, understanding and communication needs, and parents will normally be informed that a referral is being made unless doing so would increase risk.

5.7 Escalating Concerns

If staff believe that a concern has not been acted upon appropriately, they must escalate to the DSL, DDSL, Headteacher, Director of Safeguarding and Attendance, Children's Social Care, police, LADO or NSPCC as appropriate. Professional disagreement must not delay action to safeguard a pupil.

5.8 Recording Standards on Myconcern

- Records must be factual, timely, dated and professionally written.
- Records must distinguish between fact, observation, opinion and third-party information.
- Records must include action taken, decisions made, advice received, outcomes and rationale.
- Records must include pupil voice, including non-verbal communication, where available.
- Records must be free from judgmental language or unsupported assumptions.
- Records about allegations against staff must not be recorded on the pupil's MyConcern profile unless specifically agreed through the safeguarding and allegations process.

6.0 FAMILY HELP & EARLY HELP

Academy staff will act early when a pupil or family needs support. This may involve support from the academy or community services, or a referral to Family Help where needs are more complex or require coordinated support.

Staff should be alert to pupils and families who may need:



- universal or community-based support, including pastoral, attendance, family liaison, health or voluntary-sector support;
- targeted Family Help where needs are multiple or complex but statutory intervention is not required;
- section 17 support where a pupil is in need, including where they are disabled; or
- section 47 enquiries where there is reasonable cause to suspect significant harm.

Family Help is usually voluntary and requires consent. However, refusal or withdrawal of consent must not prevent a referral where a pupil may be in need or at risk of significant harm.

The DSL will use local thresholds and professional judgement to decide the appropriate level of support. Decisions and reasons will be recorded on MyConcern.

Where Family Help is in place, the academy will contribute to assessment, planning, information-sharing and review. The DSL will escalate concerns where there is drift, delay, non-engagement or increasing risk.

6.1 Indicators that Family Help may be needed

- persistent or unexplained absence;
- changes in behaviour, emotional regulation, communication, presentation or engagement;
- pupil or family mental health needs;
- domestic abuse, parental conflict, substance misuse or parental offending;
- housing instability, homelessness, financial hardship or food insecurity;
- young caring responsibilities;
- risk of exploitation, serious violence, online harm or radicalisation;
- repeated suspension, part-time timetable, classroom removal or risk of exclusion;
- concerns linked to medical needs, personal care, intimate care or neglect; and
- additional vulnerability due to SEND, disability, communication needs or dependency on adults.

7.0 PUPILS WHO MAY BE PARTICULARLY VULNERABLE

Some pupils have an increased risk of abuse, neglect or exploitation, and additional barriers can exist when recognising or reporting harm. Staff must be professionally curious and must not assume that indicators of harm are explained by a pupil's diagnosis, disability, communication profile or behaviour support needs.

- disabled pupils, pupils with special educational needs, health conditions, sensory needs, communication needs or complex medical needs;
- pupils who are non-verbal, pre-verbal or who communicate through AAC, objects of reference, behaviour or other means;
- pupils who require intimate care, personal care, medication, moving and handling or physical support;
- pupils who are looked after, previously looked after, in kinship care or who have a social worker;
- young carers;
- pupils affected by domestic abuse, parental mental health, substance misuse or parental offending;
- pupils at risk of child sexual exploitation, child criminal exploitation, trafficking, modern slavery, county lines or serious violence;

- pupils at risk of FGM, forced marriage, honour or faith-based abuse or radicalisation;
- pupils who are asylum seekers, refugees, homeless, living in temporary accommodation or living transient lifestyles;
- pupils who have experienced repeated suspension, classroom removal, part-time timetables or prolonged absence from education;
- pupils who are pregnant or parents themselves;
- pupils experiencing bullying, prejudice, discrimination, isolation or harassment; and
- pupils who are questioning their gender or who are perceived to be lesbian, gay, bisexual or trans.

Safeguarding information and support must be accessible to pupils. Staff should consider whether pupils need communication support, visual resources, social stories, trusted adult support, advocacy, interpreters or specialist advice to understand risk and communicate concerns.

For pupils with SEND, risk assessments must consider the interaction between disability and the environment, including transport, personal and intimate care, medication, moving and handling, online access, peer relationships, residential or respite care, alternative provision, use of seclusion or restrictive intervention, and reliance on adults. Any allegation must be assessed on its own facts and not discounted because a pupil's account is inconsistent, delayed, communicated through behaviour or differs from an adult's account.

8.0 TYPES OF SAFEGUARDING CONCERNS

Abuse, neglect and exploitation are rarely isolated events and often overlap. Pupils may be harmed by adults or by other pupils, within or outside the home, within the community and online. Staff must record and report all concerns on MyConcern.

8.1 Mental Health

Mental health concerns may be a safeguarding concern in their own right or may indicate abuse, neglect, exploitation, trauma or unmet need. Staff should be alert to self-harm, suicidal ideation, eating disorders, anxiety, low mood, withdrawal, distress, changes in presentation and behaviour that may communicate emotional need. Concerns must be reported to the DSL and recorded on MyConcern.

Staff must not assume that self-injury, distress, withdrawal, dysregulation or changes in presentation are an inevitable feature of a pupil's SEND. The academy will provide an immediate safeguarding response where there is risk of harm, alongside reasonable adjustments and referral to health or mental health services. Mental health support must not replace child-protection action where abuse, neglect or exploitation is suspected.

8.2 Specific Safeguarding Issues

- domestic abuse, including seeing, hearing or experiencing the effects of domestic abuse;
- child sexual exploitation and child criminal exploitation, including county lines, financial exploitation and coercion;
- serious violence, gang involvement and threats involving weapons;
- radicalisation and extremism, including referrals to Prevent or Channel where appropriate;
- female genital mutilation, forced marriage and honour or faith-based abuse;
- modern slavery, trafficking and exploitation;
- homelessness and insecure accommodation;



- private fostering arrangements;
- children with family members in prison and pupils involved in the court system;
- young carers;
- pupils with medical conditions and/or complex health needs;
- online harm, harmful content, grooming, cyberbullying, sextortion, exploitation, image sharing and AI-generated abuse;
- child-to-parent or caregiver abuse; and
- contextual and extra-familial harm.
- violence against women and girls, including misogyny, sexual harassment, stalking, coercive control and abuse in teenage relationships;
- Operation Encompass notifications and the provision of timely, trauma-informed support following police-attended domestic abuse incidents;
- temporary accommodation notifications and any resulting safeguarding, attendance, health, transport or continuity-of-education concerns;
- cybercrime, including unauthorised access, denial-of-service attacks, malware and involvement in online offending;
- pupils managed within the youth secure estate or affected by justice-system involvement.

8.3 Contextual & Extra-Familial Safeguarding

Extra-familial harm refers to abuse or exploitation that occurs outside the family environment. Contextual safeguarding is the approach used to understand and respond to the wider relationships, environments, and circumstances in which such harm may occur. HEdT academies will identify and respond to risks in the academy, local community, transport routes, peer groups, social media, online environments, alternative provision and any settings where pupils spend time.

Each academy must maintain a local contextual safeguarding statement on their academy website. This statement must set out relevant risks and the academy's response through staff training, pupil voice, curriculum, site supervision, online safety, attendance, behaviour, transport and partnership work. This is not an exhaustive list.

9.0 CHILD-ON-CHILD ABUSE, SEXUAL VIOLENCE, SEXUAL HARASSMENT & HARMFUL SEXUAL BEHAVIOUR

All child-on-child abuse is unacceptable and will be taken seriously. It must never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys". HEdT recognises that child-on-child abuse may be happening even when no reports have been made.

Child-on-child abuse can happen inside or outside the academy and online. It may involve pupils of any age, sex, gender, ability or background. Pupils with SEND or communication needs may be particularly vulnerable because they may not recognise abuse, may be dependent on adults or peers, or may communicate distress through behaviour.

9.1 Forms Of Child-On-Child Abuse

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse in intimate personal relationships between pupils;
- physical abuse, serious assault, initiation or hazing-type violence;
- sexual violence and sexual harassment;
- harmful sexual behaviour;



- misogynistic or misandrist abuse and harassment;
- causing another pupil to engage in sexual activity without consent;
- making, requesting, sharing or threatening to share nudes or semi-nudes, including digitally altered or AI-generated images, deepfakes or deep nudes;
- upskirting; and
- coercive, controlling, intimidating or exploitative behaviour.

9.2 Harmful Sexual Behaviour

Harmful sexual behaviour exists on a continuum, ranging from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent behaviour. Staff must consider the pupil's age, developmental stage, understanding, vulnerability, communication needs, any difference in age or power and the context of the behaviour.

Pupils who display harmful sexual behaviour may themselves have experienced abuse, neglect, trauma or exploitation. The safeguarding response must consider the needs of the pupil who has experienced harm, the pupil alleged to have displayed harmful behaviour and any other pupils who may be affected.

Assessment, and any assessment tools used must distinguish between developmentally expected, inappropriate, problematic, abusive and violent sexual behaviour. For pupils with SEND, this requires consideration of developmental understanding, communication, sensory seeking, learned behaviour, capacity to understand consent, vulnerability to coercion and the impact on others. SEND is never an explanation for failing to safeguard other pupils, but it must inform proportionate assessment, teaching, support and intervention.

9.3 Responding to Concerns & Reports

- All concerns and reports must be shared with the DSL without delay and recorded on MyConcern.
- Every incident involving the making or sharing of nudes or semi-nudes requires a safeguarding response, whether the image-sharing appears consensual or non-consensual. Staff must not view, copy, print, forward, save or ask a pupil to delete imagery unless specifically directed under the academy's agreed UKCIS-based procedure and, where appropriate, by police.
- Staff should use only limited, open questions necessary to clarify what has been reported.
- Staff must not investigate, seek written statements or mediate between pupils where this may interfere with a statutory investigation or increase risk.
- The DSL will consider whether advice is required from Children's Social Care, police, LADO, health or other specialist agencies.
- Parents will normally be informed unless this would increase risk, compromise an investigation or be contrary to the pupil's welfare.
- Support and safety planning will be provided for all pupils involved as appropriate.

9.4 Risk assessment & safety planning

Where child-on-child abuse, sexual violence, sexual harassment or harmful sexual behaviour is alleged or identified, the DSL will consider whether a written risk assessment and safety/support plan is required. This may include supervision, movement around the site, seating, transport, timetable, staffing, personal care, curriculum, social times, online access, alternative provision and communication arrangements.



Restorative approaches, mediation or direct contact between pupils will not be used where this may pressure, blame or re-traumatise a pupil. Any restorative work will only be considered following careful risk assessment and where it is safe, appropriate and in the best interests of the pupil who has experienced harm.

9.5 Temporary separation for safeguarding purposes

In rare circumstances, it may be necessary to temporarily separate pupils for safeguarding purposes. This is not a suspension or permanent exclusion on disciplinary grounds and must not be used as an informal or precautionary exclusion. Any decision will be made on a case-by-case basis, led by the DSL/Headteacher, recorded with rationale and reviewed regularly.

10.0 ONLINE SAFETY, FILTERING & MONITORING, MOBILE PHONES, WEARABLES & GENERATIVE AI

Online safety is an integral part of safeguarding. HEdT recognises that pupils may experience online harm in academy, at home, in the community and through devices not owned by the academy. Online harm can include abuse, bullying, exploitation, grooming, radicalisation, exposure to harmful content, image-based abuse, sextortion, deepfakes, cybercrime and misuse of generative artificial intelligence.

10.1 Filtering & Monitoring

The academy will take all reasonable steps to minimise pupils' exposure to harmful and inappropriate content through the academy's IT systems and internet-connected devices. The academy uses Netsweeper as their filtering and monitoring provider.

- Clear roles and responsibilities will be assigned for filtering and monitoring.
- The responsible member of the Senior Leadership Team will be supported by the DSL and IT staff/provider.
- The effectiveness of filtering and monitoring will be reviewed at least once every academic year and whenever significant changes are made to systems or risk is identified.
- Checks will confirm that filtering and monitoring operate appropriately on all academy-managed internet-connected devices, networks and user profiles in all relevant locations, including off-site or remote-use arrangements where these are controlled by the academy. Findings and actions will be recorded.
- Records of checks, findings and actions will be retained.
- Staff will understand their responsibilities for reporting online safety concerns and monitoring alerts through MyConcern or other agreed routes.
- Systems will seek to block harmful content without creating unreasonable restrictions on teaching and learning.
- Online safety teaching and reporting routes will be adapted for pupils with SEND. Staff will explicitly teach concepts that may not be inferred, including privacy, consent, trusted adults, scams, grooming, coercion, image-sharing, location-sharing and how online contacts may misrepresent identity. Visual, repetitive and scenario-based teaching will be used as appropriate.
- The academy will balance protection with educational access and equality duties. Filtering must not unreasonably restrict access to information pupils need for learning, identity, health or safeguarding support. Any override arrangements will be authorised, time-limited and recorded.

10.2 Mobile Phones & Personal Devices including wearables.

In line with Keeping Children Safe in Education 2026 and DfE guidance on mobile phones in schools, the academy aims to maintain a safe, focused and mobile phone-free environment throughout the school day.

For the purposes of this policy, personal devices include mobile phones, tablets, cameras, smartwatches, fitness trackers, smart glasses, headphones and any other wearable or connected technology capable of:

- communicating or accessing the internet;
- sending or receiving messages or notifications;
- tracking location; or
- capturing, recording or sharing images, video or audio.

Staff, volunteers and visitors must:

- not use personal mobile phones or other personal devices in the presence of pupils, except in an emergency or where expressly authorised for a legitimate operational purpose;
- never use a personal device to photograph, film or make an audio recording of a pupil;
- never store or share images, recordings, personal information or other school-related information about pupils on a personal device or personal account;
- ensure personal devices are switched off or silenced and stored securely while working with pupils; and
- use only school-approved devices, systems and accounts for educational activities and for recording, storing or communicating information about pupils.

Pupils must not access or use personal mobile phones, smartwatches or other connected technology at any point during the school day. This includes during lessons, transitions, breaktimes and school trips. Any device brought into the academy must be switched off and stored in accordance with the academy's agreed procedures.

Any exception must be agreed in advance by an appropriate senior leader, normally following discussion with the pupil's parent or carer. Exceptions will be considered on an individual basis and may include a medical need, disability, communication need or other provision identified within the pupil's Education, Health and Care Plan or support plan.

Where an exception is agreed, a written risk assessment and clear management arrangements must be in place. These must specify:

- why the device is required;
- when, where and how it may be used;
- how unauthorised recording, communication or internet access will be prevented;
- how the device will be stored and supervised; and
- when and how the arrangement will be reviewed.

Any unauthorised use of a device, including photographing, filming, audio recording or sharing information, must be reported immediately and managed in accordance with the academy's safeguarding, behaviour, online safety, searching and confiscation, data protection and staff

conduct procedures. Where an incident raises a safeguarding concern, it must be reported without delay to the Designated Safeguarding Lead.

10.3 Generative artificial intelligence

- Staff and pupils must use only Trust-approved AI applications and must follow the Trust's acceptable-use, online-safety and data-protection requirements. Personal, confidential or safeguarding information must never be entered into a public or unapproved AI system. Staff must not upload photographs, recordings, pupil work or other identifiable information about pupils without appropriate authorisation and a clear lawful basis.
- AI-generated information must not be assumed to be accurate. Any content used for educational or professional purposes must be checked for accuracy, bias, suitability and potential harm. AI must not replace professional judgement, safeguarding decision-making or direct engagement with a child.
- Any concern involving AI-generated, AI-altered or digitally manipulated content must be reported to the Designated Safeguarding Lead without delay and recorded on MyConcern. Staff must not investigate the matter themselves or copy, download, forward, share or unnecessarily view potentially illegal or harmful content. Relevant information should be preserved safely in accordance with the school's safeguarding procedures and DSL advice.
- Where the concern involves a nude or semi-nude image of a person under 18 including content that has been digitally altered or wholly generated using AI, it must be treated as a safeguarding concern and managed in accordance with the school's procedures for responding to the sharing of nudes and semi-nudes.

10.4 Sharing nudes & semi-nudes

All incidents involving the making, possession, requesting, sharing or threatening to share nudes or semi-nudes require a safeguarding response, whether apparently consensual or non-consensual. This includes photographs, videos, livestreams, digitally altered images, AI-generated images, deepfakes and deep nudes. The academy will follow current UKCIS guidance and seek advice from police and Children's Social Care where appropriate.

10.5 Photography & digital images

Photographs, video and audio recordings of pupils must be taken, stored, used and shared only for an agreed and legitimate purpose, in accordance with the Trust's consent arrangements, safeguarding procedures and data protection requirements.

- Only Trust-approved devices, systems and accounts may be used. Images and recordings must not be taken, stored or shared using personal devices, personal accounts or unauthorised applications, including generative AI platforms.
- Before capturing or using an image or recording, staff must check that appropriate consent or another lawful basis is in place and consider any safeguarding restrictions relating to the pupil. Images must be appropriate, respectful and avoid revealing unnecessary personal information, location details or other identifying information.
- Access must be limited to authorised individuals, and images and recordings must be stored securely, retained only for as long as necessary and deleted securely in accordance with the Trust's retention arrangements.

11.0 ATTENDANCE, CHILDREN ABSENT FROM EDUCATION & PUPILS MISSING EDUCATION

Knowing where pupils are during academy hours is an essential safeguarding responsibility. Repeated or prolonged absence from education may indicate abuse, neglect, exploitation, child criminal exploitation, child sexual exploitation, trafficking, modern slavery, serious violence, forced marriage, FGM, mental health need, family difficulty or unmet SEND need.

- Staff must follow academy attendance and first-day response procedures.
- The academy will maintain at least two current emergency contact numbers for each pupil wherever possible.
- Unexplained absence will be followed up promptly.
- Patterns of repeated or prolonged absence will be reviewed by attendance and safeguarding staff.
- The DSL will be alerted to absence patterns that may indicate safeguarding risk.
- The academy will make reasonable enquiries to establish the pupil's whereabouts and safety.
- Where a pupil cannot be located or there is concern for their safety, the academy will contact parents, Children's Social Care, police and the local authority as appropriate.
- Safeguarding concerns linked to absence must be recorded on MyConcern.
- Where the academy receives information that a pupil is living in temporary accommodation, leaders will promptly review contact details, transport, attendance, health, welfare, online access and continuity of education, share information with relevant professionals and record any safeguarding action.
- For looked-after children, the academy will work with the designated teacher, social worker and Virtual School Headteacher to improve attendance and address safeguarding barriers. For pupils with SEND, absence will be reviewed alongside transport, health, sensory, anxiety, communication, unmet provision and reasonable-adjustment needs; this must not reduce professional curiosity about abuse, neglect or exploitation.

11.1 Pupils Missing Education

Where a pupil leaves the academy, the academy will take reasonable steps to identify their destination, record the receiving school and expected start date, transfer records securely, and notify the local authority where required. Safeguarding files will be transferred securely in accordance with section 20 of this policy.

11.2 Elective Home Education

Where a parent expresses an intention to educate a pupil at home, the academy will inform the Local Authority. The DSL and/or Headteacher will ensure relevant information is shared with the Local Authority in line with statutory requirements and local procedures.

11.3 Pupils With Medical Conditions Who Cannot Attend School

The academy will follow statutory guidance and local procedures for pupils who cannot attend school because of health needs. Safeguarding concerns linked to prolonged absence, medical needs, parental engagement, access to education or welfare will be recorded on MyConcern and reviewed by the DSL.

12.0 ALTERNATIVE PROVISION, OFF-SITE ACTIVITIES & USE OF ACADEMY PREMISES

12.1 Alternative provision

Where a pupil attends alternative provision, the academy remains responsible for safeguarding. The academy will undertake and record safeguarding due diligence before a placement starts, including where the provider appears on a local authority approved list.

- record the provider's address and details of any subcontracted provision or satellite sites;
- obtain safeguarding and safer recruitment assurance;
- share relevant safeguarding, SEND, medical, behaviour, risk assessment and communication information with the provider;
- require the provider to notify the academy of any changes that may affect the pupil's safety;
- maintain effective communication with the provider;
- monitor attendance and welfare for each session/day as appropriate;
- review the placement at least half-termly, or immediately where a safeguarding concern arises;
- record concerns and significant updates on MyConcern; and
- suspend or end the placement where safeguarding arrangements are not satisfactory.
- For pupils with SEND, commissioning and review will confirm that staff can meet communication, medical, sensory, behaviour-support, personal-care and risk-management needs; that reasonable adjustments are in place; and that the pupil has an accessible way to report concerns directly to academy staff.
- The academy will check that the pupil attends the specific address and provision commissioned. Providers must not change premises, subcontract, use satellite sites, alter staffing or place the pupil with another organisation without prior written agreement and renewed safeguarding due diligence.

12.2 Educational visits & off-site activities

All educational visits, off-site activities, work experience, community learning, sports activities and residential visits will be subject to appropriate risk assessment. Safeguarding risks must be considered alongside health and safety risks. Staff must know how to contact the DSL during off-site activities and how to record concerns on MyConcern.

12.3 Use of academy premises for non-school activities

Where another organisation provides services or activities on academy premises, the academy will seek assurance that appropriate safeguarding arrangements are in place. This includes child protection policies, safer recruitment procedures, reporting routes, insurance and arrangements for sharing concerns. These expectations will be included in hire, lettings or transfer-of-control agreements. Failure to comply may result in termination of the arrangement.

13.0 SAFER RECRUITMENT, VOLUNTEERS, CONTRACTORS & THE SINGLE CENTRAL RECORD

The Trust operates safer recruitment procedures to deter, reject or identify people who may pose a risk of harm to pupils. The Trust will follow KCSIE 2026, the School Staffing Regulations, the Independent School Standards and local safeguarding partner arrangements.

- At least one member of each recruitment panel will have completed safer recruitment training.
- Pre-appointment checks will include identity, right to work, qualifications where required, employment history, references, criminal record information, barred list checks where required, prohibition checks where required, section 128 checks where required, overseas checks where required and checks on suitability to work with pupils.
- Online searches of shortlisted candidates may be undertaken as part of due diligence to identify publicly available information relevant to suitability. Candidates will be informed that this may occur, and findings will be handled fairly, lawfully and separately from protected-characteristic information.
- Where KCSIE permits a DBS certificate issued before appointment to be accepted, the Trust will follow the current DfE requirements, including any requirement that it has been issued within 30 calendar days, and will document identity checks, risk assessment and any DBS Update Service verification.
- Written confirmation will be obtained from supply agencies, third-party organisations and training providers that appropriate checks have been completed.
- The academy will not knowingly allow a barred person to engage in regulated activity.
- The academy will maintain a Single Central Record of all required recruitment and vetting checks. The Headteacher remains responsible for ensuring that the appropriate checks have been completed for all staff and that the record is accurate and up to date.

13.1 Volunteers

- Before a volunteer begins work, the academy will complete and record a written risk assessment to determine the nature of the role, whether it constitutes regulated activity and which safer-recruitment checks are required.
- From 1 September 2026, following the removal of the supervision exemption by the Crime and Policing Act 2026, a volunteer will be engaging in regulated activity where their role involves teaching, training, instructing, caring for or supervising children:
 - frequently;
 - on more than three days in any 30-day period;
 - or overnight.

This applies even where the volunteer is supervised. Certain activities, including relevant personal care and healthcare, constitute regulated activity regardless of how frequently they are undertaken.

- Where a volunteer will undertake regulated activity, the academy will obtain an enhanced DBS check that includes children's barred-list information. The academy must confirm the individual's children's barred-list status before permitting them to begin regulated activity. Where legally permitted, a standalone barred-list check may be undertaken to allow the volunteer to begin regulated activity while the enhanced DBS certificate is awaited.
- The academy will review the arrangements for existing volunteers whose roles become regulated activity from 1 September 2026 and obtain the required children's barred-list information.
- Where a volunteer is not undertaking regulated activity, the academy will use its professional judgement and written risk assessment to determine whether another level of DBS check is appropriate. The assessment will consider the nature and frequency of the work, the level of contact with pupils, what is known about the individual and whether suitable references are available.

- Under no circumstances will a volunteer for whom no checks have been obtained be left unsupervised or permitted to undertake regulated activity. The details and outcome of the risk assessment and all checks completed will be recorded.

13.2 Contractors & third-party staff

The academy will ensure contractors and third-party staff including volunteers working on premises have undergone appropriate checks for the work they will undertake. Where a contractor will engage in regulated activity, an enhanced DBS check with children's barred-list information will be required. The academy will check identity on arrival and obtain assurance that checks have been completed.

13.3 Single Central Record (SCR)

The academy will maintain an accurate and up to date Single Central Record (SCR) using the Online SCR system. The SCR will include:

- all staff employed by the academy, including teacher trainees on salaried routes;
- agency and third-party supply staff working at the academy;
- members of the academy's proprietor body, including relevant governors and trustees; and
- relevant volunteers and any other individuals for whom the academy records safer-recruitment checks.

The SCR will record the checks required by statutory guidance. The academy will retain evidence of the assurances received from agencies and third-party organisations.

Each academy's SCR will be maintained by its designated SCR keeper. Records for individual academies will be clearly identifiable and capable of being provided separately, accurately and without delay to any person legally entitled to inspect them.

The SCR will be reviewed at least monthly by the Headteacher or an appropriately trained senior leader. These checks will confirm that the record is complete, accurate and supported by the required evidence. The outcome of each review, including any omissions and actions required, will be recorded and followed up promptly.

The SCR will also be subject to periodic scrutiny by the Trust Director of Operations, and other Trust safeguarding assurance processes. Any discrepancy that may affect an individual's suitability to work with children must be escalated immediately to the Headteacher and resolved before the individual undertakes unsupervised or regulated activity.

13.4 Childcare Disqualification

The Trust will comply with the Childcare Disqualification Regulations 2018 and the statutory guidance *Disqualification under the Childcare Act 2006*. Appropriate checks will be completed for relevant staff working in early years provision, including reception classes, and for relevant staff working in after-school childcare involving children under the age of eight. These requirements also apply to staff directly concerned with the management of that provision.

Relevant staff will be informed of their duty to disclose information that may affect their suitability. The Trust will record that the required checks have been completed and will not

employ a disqualified person in relevant childcare provision unless an appropriate waiver has been granted.

14.0 ALLEGATIONS & SAFEGUARDING CONCERNS ABOUT ADULTS

This section applies to concerns or allegations about any adult working in or on behalf of the academy, including staff, supply staff, trainee teachers, volunteers, contractors, governors, trustees and central team staff. All concerns about adults, no matter how small, must be reported without delay.

14.1 Concerns & allegations that may meet the harm threshold

A concern or allegation may meet the harm threshold where an adult has:

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a pupil;
- behaved towards a pupil or pupils in a way that indicates they may pose a risk of harm to pupils; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with pupils.

Risk of harm may also relate to behaviour outside the academy and is known as transferable risk. This may include conduct in an individual's personal life that raises concerns about their suitability to work with children.

Any concern or allegation that may meet the harm threshold must be reported immediately to the Headteacher. Staff must not investigate, question witnesses or discuss the matter more widely before it has been considered through the appropriate safeguarding process.

The Headteacher will act as case manager or, where appropriate, appoint a senior leader to undertake this role. The case manager will consult the Local Authority Designated Officer (LADO) without delay and before beginning any internal investigation.

The LADO's advice will inform decisions about immediate safeguarding action, contact with the police or children's social care, communication with the individual and child, and any subsequent investigation.

Where the concern or allegation relates to the Headteacher, it must be reported immediately to the CEO or the Director of Safeguarding and Attendance, who will ensure that the LADO is consulted.

Where it concerns a member of the Executive Team, it must be reported to the CEO.

Where it concerns the CEO, it must be reported to the Chair of Trustees or the Director of Safeguarding and Attendance. If there is a conflict of interest, or the usual reporting route is unavailable, the concern must be reported directly to the LADO.

The academy will manage allegations fairly, promptly and confidentially, prioritising the welfare of the child while supporting all individuals involved and complying with statutory policy and local safeguarding-partner procedures.

14.2 Low-level concerns

A low-level concern is not an insignificant concern. It is any concern, however small, including a sense of unease or a “nagging doubt”, that an adult working in or on behalf of the academy may have acted in a way that is inconsistent with the Staff Code of Conduct, including conduct outside work, but does not appear to meet the harm threshold.

Examples may include, but are not limited to:

- being overfriendly with pupils or showing favouritism;
- using personal devices to photograph pupils contrary to policy;
- being alone with a pupil in a secluded area or behind a closed door without a legitimate reason;
- humiliating pupils or using inappropriate language;
- failing to maintain appropriate professional boundaries; or
- using reasonable force or restrictive intervention in a way that causes concern.

All low-level concerns must be reported without delay through the 'Staff Safeguarding' (previously known as Confide,) and managed in line with the Trust Managing Allegations and Low-Level Concerns Policy. Records will be stored securely, reviewed for patterns or emerging concerns and acted upon appropriately. Where there is any doubt about whether a concern may meet the harm threshold, advice will be sought from the Director of Safeguarding and Attendance and LADO.

All staff have a duty to act on and report concerns. Where it is safe and appropriate to do so, staff should address the conduct at the time, while ensuring the concern is still reported through the '**Staff Safeguarding**' portal. A failure to report a concern may itself be considered under the Staff Code of Conduct or relevant Trust procedures.

14.3 Supply staff, trainee teachers & contractors

Where a concern relates to a supply teacher, trainee teacher, contractor or other person provided by a third-party organisation, the academy will work closely with the relevant agency, employer or training provider. Safeguarding responsibilities are shared, but the academy remains responsible for gathering the facts and managing the safeguarding process. The agency, employer or training provider will usually lead any disciplinary or training action.

The academy will first ensure that pupils are protected, then consult the Trust Director of Safeguarding and Attendance and LADO where appropriate and share relevant information with the third party.

14.4 Speaking out & Whistleblowing

All staff and volunteers have a duty to raise concerns about poor, unsafe or unprofessional practice, including any failure to safeguard pupils. Concerns should be reported through academy or Trust procedures, including Speak Out at Horizons (SOAH). Staff may also contact the NSPCC Whistleblowing Advice Line or another appropriate external agency where they believe this is necessary to protect pupils.

15.0 REASONABLE FORCE, RESTRICTIVE INTERVENTIONS & INTIMATE CARE

There are limited circumstances in which staff may use reasonable force to safeguard a pupil or another person. Any intervention must be necessary and proportionate, use the least amount of force required and continue for the shortest possible time. Restrictive intervention must never be used as punishment or merely to secure compliance where there is no relevant risk.

The academy will use positive and proactive support, including prevention, de-escalation, reasonable adjustments, individual behaviour support plans, risk assessments and regulation plans, to minimise the need for restrictive intervention. Particular care will be taken where a pupil has SEND, a medical condition, mental health need, trauma history, communication need or sensory need.

Every significant incident in which a member of staff uses force on a pupil, and every incident involving seclusion or restraint, including restraint without direct physical contact, must be:

- recorded in writing as soon as practicable and, wherever possible, on the same day;
- reported to parents in writing as soon as practicable and, wherever possible, on the same day;
- reviewed to consider its impact, the pupil's account, the effectiveness of prevention and de-escalation, any injuries or support required and whether individual plans should change; and
- monitored to identify repeated incidents, patterns, staff-development needs and any disproportionate use affecting pupils with SEND, protected characteristics or other vulnerabilities.

Information may be withheld from a parent only where informing that parent would be likely to result in serious harm to the pupil. The incident must be reported to any other parent who can be informed without causing serious harm. Where no parent can safely be informed, it must be reported to the local authority in whose area the pupil ordinarily resides. The decision and rationale must be recorded.

Where an incident raises a concern about possible abuse, inappropriate practice, harm to a pupil or an allegation against a member of staff, it must be managed under this safeguarding policy and the Trust's procedures for managing allegations and low-level concerns.

Detailed procedures are set out in the Trust's Restrictive Intervention Policy and the DfE's [Restrictive interventions, including use of reasonable force, in schools](#), effective from 1 April 2026.

15.1 Intimate & Personal Care

Pupils who need intimate or personal care are particularly vulnerable because they may be dependent on adults and may have additional communication barriers. Intimate care must be provided respectfully, safely and in line with individual care plans, risk assessments, dignity, privacy and safeguarding expectations. Concerns arising during intimate care must be reported to the DSL and recorded on MyConcern.

Care plans will specify consent/assent, communication cues, staffing, privacy, recording, changes from usual presentation and how the pupil can indicate discomfort or stop. Staff must report

unexplained injury, pain, bleeding, infection, changes in continence, sexualised behaviour, distress around care or a marked change in response to a particular adult. A pupil's dignity and need for care must be protected without creating unnecessary barriers to disclosure.

16.0 SPORT, TOILETS, CHANGING FACILITIES, RESIDENTIAL VISITS & SLEEPING ARRANGEMENTS

The academy will manage sport, toilets, changing rooms, showers and overnight accommodation in accordance with *Keeping Children Safe in Education 2026*, the Equality Act 2010 and relevant premises, safeguarding and residential standards.

16.1 Toilets, Changing & Showers

The academy will provide separate toilet facilities for boys and girls aged 8 years and over, except where a toilet is in a self-contained room intended for use by one pupil at a time. Pupils will not use toilets, changing rooms or showers designated for the opposite biological sex.

Where a pupil does not wish to use facilities designated for their biological sex, the academy will consider whether a suitable individual facility or alternative arrangement can be provided. This must not reduce the provision of single sex facilities or compromise the safety, comfort, privacy or dignity of any pupil. Arrangements will be recorded, communicated appropriately and reviewed regularly.

16.2 Sport

The academy may organise sport according to biological sex where the physical strength, stamina or physique of one sex would place pupils at a disadvantage, or where single sex participation is required for safety. Where separation is necessary for safety, there will be no exceptions.

Decisions will take account of pupils' age, safety, fairness and welfare, together with relevant National Governing Body guidance and the academy's duties under the Equality Act 2010.

16.3 Residential Visits & Sleeping Arrangements

Residential visits, sports tours, camps and other overnight activities will be subject to a documented safeguarding and educational visits risk assessment.

Pupils will not share overnight accommodation with pupils of the opposite biological sex. Where a pupil does not wish to share accommodation with pupils of the same biological sex, suitable separate accommodation will be sought where possible. Any alternative arrangement must protect the safety, comfort, privacy and dignity of all pupils.

17.0 Pupils Questioning their gender

The academy will provide a respectful and supportive environment for pupils who are questioning their gender. Staff will listen carefully and seek to understand the pupil's feelings, circumstances and wider experiences. They will remain alert to any related concerns involving the pupil's wellbeing, mental health, family relationships, friendships, SEND, bullying or safeguarding.

Bullying, harassment and discrimination will not be tolerated. The academy will not make assumptions about a pupil's gender because of their interests, clothing, behaviour or choice of activities.

In this policy, social transition means a request for the academy to make changes so that a pupil is treated as the opposite biological sex. This could include a request to use a different name or pronouns or to change aspects of uniform, records or school arrangements.

Where a pupil talks about their feelings but does not ask the academy to make any changes, staff should listen and offer appropriate support. The information should be treated sensitively and shared only where necessary. Staff must follow normal safeguarding procedures if the conversation raises a concern about the pupil's safety or welfare and must not promise complete confidentiality.

The academy will not suggest or initiate social transition. Individual staff must not promise or make changes unless the request has been considered through the academy's agreed process.

Any request from a pupil or parent or carer must be referred to the Headteacher and DSL. It will be considered carefully and individually because making these changes may have significant effects on the pupil and others.

Parents or carers will be involved as a matter of priority, and their views will be given significant weight. In the rare circumstances where contacting them may place the pupil at greater risk, the DSL will first decide what action is needed to safeguard the pupil.

When considering a request, the academy will take account of:

- the welfare and best interests of the pupil and other pupils;
- the pupil's age, maturity, views and individual circumstances;
- the pupil's mental health, SEND, communication needs and any safeguarding concerns;
- the views of parents or carers;
- relevant advice from the DSL, SENCO, health professionals or other professionals;
- the likely effects of agreeing or refusing the request;
- whether another form of support could meet the pupil's needs; and
- the academy's legal duties relating to safeguarding, equality and human rights.

Requests involving primary-aged pupils will be approached with particular caution. Agreement to all requested changes will be very rare. Staff will not give clinical advice or make judgements that require medical expertise. Support will avoid placing pressure on the pupil to reach a particular outcome and will allow their needs and wishes to change over time.

Decisions and the reasons for them will be recorded. Information will be shared only with people who need it to safeguard or support the pupil or others. Arrangements will be reviewed at agreed intervals and whenever the pupil's needs or circumstances change.

The pupil's biological sex, meaning their sex recorded at birth, will be recorded accurately wherever the academy is legally required to record sex. Relevant staff will be given the information they need to safeguard and support the pupil and others.

A pupil who wishes to change or reverse an arrangement previously agreed will be supported. The academy will review the arrangements with the pupil, their parents or carers and relevant professionals.

Any support agreed must be consistent with Section 16 of this policy concerning sport, toilets, changing facilities and residential arrangements.

18.0 TRAINING & SAFEGUARDING CULTURE

Safeguarding training is central to a strong safeguarding culture.

All staff, including those who do not work directly with pupils, must read and understand Part One of *Keeping Children Safe in Education 2026*. Safeguarding and child protection training will be provided at induction, regularly updated and supported by updates at least annually.

18.1 Staff Training Will Include:

- staff roles and responsibilities for safeguarding and promoting pupils' welfare;
- the identity and role of the DSL and DDSLs;
- academy safeguarding procedures, including how to report and record concerns on MyConcern;
- how to respond to disclosures, maintain appropriate confidentiality, share information and provide reassurance;
- professional curiosity and barriers that may prevent pupils, particularly those with SEND or communication needs, from reporting harm;
- signs and indicators of abuse, neglect, exploitation, modern slavery, domestic abuse and radicalisation;
- universal support, community-based early help, Family Help and section 17 and section 47 processes;
- children absent from education, repeated or prolonged absence and children missing education;
- child-on-child abuse, including bullying, harmful sexual behaviour, sexual harassment, sexual violence, misogyny, weapon-related threats and sharing nudes or semi-nudes;
- online safety, including filtering and monitoring responsibilities, harmful content, online exploitation, AI-generated content and manipulated images;
- concerns and allegations about adults, the harm threshold, low-level concerns and whistleblowing;
- Prevent, FGM, forced marriage, honour or faith-based abuse, county lines, serious violence and criminal or sexual exploitation;
- mental health concerns that may indicate or contribute to safeguarding risk; and
- safeguarding pupils with SEND, including communication barriers, intimate care, reasonable force, restrictive intervention and the need to avoid diagnostic overshadowing

18.2 DSL training

- The DSL and Deputy DSLs will undertake formal, role-specific safeguarding training at least every two years. Their knowledge and skills will also be refreshed at regular intervals, and at least annually, to ensure they remain confident, current and able to fulfil the responsibilities set out in KCSIE.
- Training and continuing professional development will be responsive to changes in legislation, statutory guidance, local safeguarding arrangements and emerging risks. It will include, as appropriate:
 - child protection procedures and effective referrals;
 - thresholds for early help and statutory intervention;



- working with children's social care, the LADO, police, health services and other agencies;
 - online safety, filtering and monitoring, generative AI and emerging technology;
 - child-on-child abuse, harmful sexual behaviour and sexual violence;
 - contextual safeguarding, exploitation, radicalisation and extra-familial harm;
 - safeguarding pupils with SEND, communication needs and medical conditions;
 - attendance, children missing education and elective home education;
 - information sharing, record keeping and transferring child protection files;
 - managing allegations and low-level concerns; and
 - supporting pupils, families and staff following safeguarding incidents.
- Professional development will extend beyond attendance at formal courses. The DSL and Deputy DSLs will participate in DSL networks, briefings, supervision, case reflection, peer review, safeguarding audits and Trust quality-assurance activity. They will maintain an up-to-date understanding of local procedures, referral pathways, services and patterns of safeguarding need.
 - Each DSL and Deputy DSL will maintain a record of training and professional development. The DSL will identify individual and team development needs and ensure that learning is translated into improved practice, staff guidance, policy development and safeguarding provision.
 - Deputy DSLs will be trained, experienced and supported to assume the full responsibilities of the DSL when required.
 - The Headteacher will ensure that sufficient time, resources, supervision and opportunities for continuing professional development are available so the safeguarding team can fulfil its responsibilities effectively.

18.3 Governor & Trustee training

Governors and trustees will receive safeguarding and child protection training, including online safety, filtering and monitoring and cyber security, at induction and at least annually so they can provide effective challenge and assurance.

19.0 CONFIDENTIALITY, INFORMATION SHARING & RECORDS

Safeguarding information is confidential, but confidentiality must never be used as a barrier to protecting pupils from harm. Staff must share information with the DSL and relevant agencies where this is necessary to safeguard and promote the welfare of pupils. The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 do not prevent the sharing of information for safeguarding purposes. Fears about data protection must not stand in the way of protecting a pupil from harm.

19.1 Information Sharing

Safeguarding information is confidential, but this must not prevent information being shared where it is necessary to safeguard a child or promote their welfare. Data protection law does not prevent appropriate safeguarding information sharing.

The Trust and its academies will follow the statutory information-sharing duty under section 16LA of the Children Act 2004, which was introduced by section 4 of the Children's Wellbeing and Schools Act 2026. Relevant information will be shared where it may help another organisation

safeguard a child, understand their needs or provide appropriate support. This includes responding to requests for information from relevant organisations.

Information will not be withheld simply because consent has not been obtained or because the child does not meet a particular statutory threshold. It does not have to be shared where doing so would be more harmful to the child than not sharing it.

Information will be shared promptly, securely and only with those who need it. The DSL will consider what information should be shared, with whom and when. Pupils and parents should normally be kept informed unless doing so would increase risk or affect safeguarding action.

Decisions to share or withhold information, and the reasons for those decisions, will be recorded on MyConcern. Staff should seek advice if they are unsure, but this must not delay action needed to safeguard a child.

19.2 Storage & Handling of Records

- Safeguarding and child protection records will be held securely on MyConcern.
- Access will be limited to those who need to see the information to safeguard pupils.
- Paper records, where used, will be stored securely and separately from the main pupil file.
- Records will include concerns, discussions, decisions, advice, actions, outcomes and rationale.
- Records will be retained and transferred in line with statutory guidance, Trust policy and data protection requirements.

19.3 Transfer of Child Protection Records

When a pupil moves to another school or setting, the DSL will ensure that the child protection file is transferred separately from the main pupil file, securely, with confirmation of receipt, ***within 5 days of an in year transfer or within the first five days of a new term.***

The transfer will include a clear, structured summary of current concerns, relevant historical context, ongoing support and actions required. Current risk will be distinguished from historic information. The receiving setting should review the information through an appropriately trained person, seek clarification where it is unclear or incomplete, and use it to support rather than disadvantage the pupil.

The DSL will consider sharing essential information in advance and holding a direct DSL-to-DSL discussion, particularly where risk to the pupil or others requires immediate planning.

20.0 GOVERNANCE, ASSURANCE & QUALITY ASSURANCE

Safeguarding governance must provide effective support and challenge. Governors, trustees and leaders will assure themselves that safeguarding arrangements are not only compliant on paper but implemented effectively in practice.

- termly safeguarding reports to governors and the Trust;
- safeguarding governor visits and reports;
- MyConcern quality assurance and dip-sampling;
- Single Central Record checks;
- training records and induction checks;
- monitoring of child-on-child abuse, harmful sexual behaviour, bullying, prejudice, restraint/restrictive intervention, attendance, suspensions and exclusions;

- filtering and monitoring checks and online safety assurance;
- alternative provision safeguarding assurance;
- review of LADO consultations, low-level concerns and staff conduct themes;
- pupil voice, including pupils with communication needs;
- staff voice and safeguarding culture checks;
- local contextual safeguarding review;
- audit and review against KCSIE, Working Together and local safeguarding partner arrangements.
- assurance that every member of staff has read Part One of KCSIE 2026 and that the Part One overview has not been used as a substitute;
- analysis of safeguarding and disciplinary data for disproportionality by sex, race, disability/SEND and other relevant characteristics, with action to challenge discriminatory practice and ensure reasonable adjustments;
- Leaders will respond to QA findings through clear actions, timescales, ownership and follow-up. The Director of Safeguarding and Attendance will provide Trust-level support and challenge and will report to executive leaders and trustees as appropriate.

21.0 LINKED POLICIES & GUIDANCE

This policy should be read alongside the following Trust and academy policies and guidance:

- Staff Code of Conduct;
- Managing Safeguarding Concerns and Allegations About Adults / Low-Level Concerns Policy;
- Whistleblowing Policy;
- Safer Recruitment Policy;
- Behaviour Policy;
- Restrictive Intervention Policy;
- Anti-Bullying Policy;
- Attendance Policy;
- Alternative Provision procedures;
- Intimate Care Procedures;
- Medical Needs Policy;
- Relationships, Sex and Health Education Policy and PSHE curriculum;
- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children 2026;
- Information Sharing Advice for Safeguarding Practitioners;
- Crime and Policing Act 2026 provisions relating to regulated activity;
- DfE guidance on reasonable force and restrictive interventions;
- DfE Generative artificial intelligence in education guidance;
- DfE Filtering and Monitoring Standards for Schools and Colleges;
- UKCIS Sharing nudes and semi-nudes: advice for education settings;
- Data (Use and Access) Act 2025;
- When to call the police: guidance for schools and colleges; and
- Local safeguarding partner procedures and threshold guidance.

APPENDIX 1: Key Contacts – Horizons Education Trust & External

Role/Organisation	Main contact	Contact details
Director of Safeguarding & Attendance	Stephanie Campey	SCampey@horizons.org.uk
Lead Safeguarding Trustee	Julie Perry	JPerry@horizons.org.uk
Local Authority MASH / Front Door	Unspecified	MASH.C&F@cambridgeshire.gov.uk
Local Authority Designated Officer (LADO)	LADO	LADO@Cambridgeshire.gov.uk
Out-of-hours emergency social care	Duty Team	01733 234724
Prevent/Channel	National police advice line	0800 011 3764
Filtering and monitoring system	Netsweeper	Contact academy
Police	Emergency / non-emergency	999 / 101
NSPCC Whistleblowing Advice Line	NSPCC	0800 028 0285

APPENDIX 2: Key Contacts – Prestley Wood Academy

Role	Name	Contact details
Headteacher	Caroline Place	07716240558 HeadTeacher@prestleywood.org.uk
Designated Safeguarding Lead (DSL)	Thomas Dougherty	07392196077 TDougherty@prestleywood.org.uk
Deputy Designated Safeguarding Lead(s) (DDSL)	Caroline Place	07716240558 HeadTeacher@prestleywood.org.uk
Deputy Designated Safeguarding Lead(s) (DDSL)	Mandy Walker	07849398717 mwalker@prestleywood.org.uk
Deputy Designated Safeguarding Lead(s) (DDSL)	Sinead Gervais	sgervais@prestleywood.org.uk
Deputy Designated Safeguarding Lead(s) (DDSL)	Joanna Tregent	07549228056 JTregent@prestleywood.org.uk
Online Safety / Filtering and Monitoring Lead	Thomas Dougherty	07392196077 TDougherty@prestleywood.org.uk
Senior Mental Health Lead	Mandy Walker	07849398717 mwalker@prestleywood.org.uk
Designated Teacher for Looked After and Previously Looked After Pupils	Thomas Dougherty	07392196077 TDougherty@prestleywood.org.uk
All the above have access to the DSL mailbox which is DSL@prestleywood.org.uk		

Area	Academy/local information
DSL & DDSL cover arrangements	For planned absences, such as holidays or pre-arranged leave, the Designated Safeguarding Lead (DSL) will ensure appropriate handover of any current safeguarding concerns to a Deputy Designated Safeguarding Lead (DDSL) before their absence begins. During unforeseen absences, including sickness or emergencies, the headteacher will appoint a DDSL to assume the responsibilities of the DSL to ensure safeguarding arrangements remain effective. The acting DDSL will be responsible for managing concerns, accessing safeguarding records, liaising with external agencies where required, and ensuring that all safeguarding procedures continue without interruption until the DSL returns.

Police safeguarding link	Prestley Wood Academy maintains strong safeguarding links with local agencies and partners. The academy works closely with the local Police Community Support Officers (PCSO), to build positive relationships with pupils and staff, provide advice, and support safeguarding education. The safeguarding team maintains an awareness of local community and crime trends to inform risk assessment, contextual safeguarding and preventative work. The academy also reviews and responds promptly to safeguarding communications and intelligence received through MASH and other partner agencies, ensuring that emerging risks are identified, monitored and acted upon appropriately to keep pupils safe
MyConcern backup procedure	In the event that MyConcern is unavailable due to power failure, internet outage, or system failure, safeguarding concerns will continue to be reported immediately to the DSL/DDSL. Staff will make a contemporaneous written record using a paper safeguarding concern form stored in the main office and DSL office. The DSL/DDSL will retain these records securely and upload them to MyConcern as soon as the system becomes available. Immediate safeguarding action, referrals to Children's Social Care, the Police, or other agencies will not be delayed because MyConcern is unavailable.

APPENDIX 3: Key Contacts – Riverside Meadows Academy

Role	Name	Contact details
Executive Headteacher	Kate Lovegrove	Klovegrove@riversidemeadows.cambs.sch.uk
Designated Safeguarding Lead (DSL) & Head of School – St Neots	Harry Barrett	Hbarrett@riversidemeadows.cambs.sch.uk
Designated Safeguarding Lead (DSL) & Head of School – Wisbech Green	Summer Ali	Sali@riversidemeadows.cambs.sch.uk
Deputy Designated Safeguarding Lead(s) (DDSL) – St Neots	Kirsty Richardson	Krichardson@riversidemeadows.cambs.sch.uk
Deputy Designated Safeguarding Lead(s) (DDSL) – Wisbech	Roxanne Douglas	Rdouglas@riversidemeadows.cambs.sch.uk
Deputy Designated Safeguarding Lead(s) (DDSL) – Both sites	Kate Lovegrove	Klovegrove@riversidemeadows.cambs.sch.uk
Deputy Designated Safeguarding Lead(s) (DDSL) – Both sites	Rebecca Grapper	Rgrapper@riversidemeadows.cambs.sch.uk
Online Safety / Filtering and Monitoring con	Nicola Brightey	Nbrightey@riversidemeadows.cambs.sch.uk
Senior Mental Health Lead	Summer Ali	SAli@riversidemeadows.cambs.sch.uk
Designated Teacher for Looked After and Previously Looked After Pupils	Rosie Smith	Rsmith@riversidemeadows.cambs.sch.uk

Area	Academy/local information
DSL and DDSL cover arrangements	For planned absences, such as holidays or pre-arranged leave, the Designated Safeguarding Lead (DSL) will ensure appropriate handover of any current safeguarding concerns to a Deputy Designated Safeguarding Lead (DDSL) before their absence begins. During unforeseen absences, including sickness or emergencies, the headteacher will appoint a DDSL to assume the responsibilities of the DSL to ensure safeguarding arrangements remain effective. The acting DDSL will be responsible for managing concerns, accessing

	safeguarding records, liaising with external agencies where required, and ensuring that all safeguarding procedures continue without interruption until the DSL returns.
Police safeguarding link	Riverside Meadows Academy maintains strong safeguarding links with local agencies and partners. The academy works closely with the local Police Community Support Officers (PCSO), to build positive relationships with pupils and staff, provide advice, and support safeguarding education. The safeguarding team maintains an awareness of local community and crime trends to inform risk assessment, contextual safeguarding and preventative work. The academy also reviews and responds promptly to safeguarding communications and intelligence received through MASH and other partner agencies, ensuring that emerging risks are identified, monitored and acted upon appropriately to keep pupils safe
MyConcern backup procedure	In the event that MyConcern is unavailable due to power failure, internet outage, or system failure, safeguarding concerns will continue to be reported immediately to the DSL/DDSL. Staff will make a comprehensive written record using a paper safeguarding concern form stored in the main office and DSL office. The DSL/DDSL will retain these records securely and upload them to MyConcern as soon as the system becomes available. Immediate safeguarding action, referrals to Children's Social Care, the Police, or other agencies will not be delayed because MyConcern is unavailable.

APPENDIX 4: Key Contacts – Spring Common Academy

Role	Name	Contact details
Headteacher	Leigh Aitken	07716240559 Laitken@springcommon.cambs.sch.uk
Designated Safeguarding Lead (DSL)	Jo Ellingworth	07716240562 Jellingworth@springcommon.cambs.sch.uk
Deputy Designated Safeguarding Lead(s) (DDSL)	Sam Buck	07741077755 Sbuck@springcommon.cambs.sch.uk
Deputy Designated Safeguarding Lead(s) (DDSL)	Alison Machin	07546 306629 Amachin@springcommon.cambs.sch.uk
Deputy Designated Safeguarding Lead(s) (DDSL)	Shari Welsford	07354902559 Swelsford@springcommon.cambs.sch.uk
Safeguarding Governor	Jeremy Lloyd	AAGJLloyd@springcommon.cambs.sch.uk
Online Safety / Filtering and Monitoring Lead	Jo Ellingworth	07716240562 Jellingworth@springcommon.cambs.sch.uk
Senior Mental Health Lead	Sam Buck	07741077755 Sbuck@springcommon.cambs.sch.uk
Designated Teacher for Looked After and Previously Looked After Pupils	Leigh Aitken	07716240559 Laitken@springcommon.cambs.sch.uk

Area	Academy/local information
DSL and DDSL cover arrangements	For planned absences, such as holidays or pre-arranged leave, the Designated Safeguarding Lead (DSL) will ensure appropriate handover of any current safeguarding concerns to a Deputy Designated Safeguarding Lead (DDSL) before their absence begins. During unforeseen absences, including sickness or emergencies, the headteacher will appoint a DDSL to assume the responsibilities of the DSL to ensure safeguarding arrangements remain effective. The acting DDSL will be responsible for managing concerns, accessing safeguarding records, liaising with external agencies where required, and ensuring that all safeguarding procedures continue without interruption until the DSL returns.

Police safeguarding link	Spring Common Academy maintains strong safeguarding links with local agencies and partners. The academy works closely with Cambridgeshire Constabulary to build positive relationships with pupils and staff, provide advice, and support safeguarding education. The safeguarding team maintains an awareness of local community and crime trends to inform risk assessment, contextual safeguarding and preventative work. The academy also reviews and responds promptly to safeguarding communications and intelligence received through MASH and other partner agencies, ensuring that emerging risks are identified, monitored and acted upon appropriately to keep pupils safe.
MyConcern backup procedure	In the event that MyConcern is unavailable due to power failure, internet outage, or system failure, safeguarding concerns will continue to be reported immediately to the DSL/DDSL. Staff will make a contemporaneous written record using a paper safeguarding concern form stored in the main office and DSL office. The DSL/DDSL will retain these records securely and upload them to MyConcern as soon as the system becomes available. Immediate safeguarding action, referrals to Children's Social Care, the Police, or other agencies will not be delayed because MyConcern is unavailable.

APPENDIX 5: FOUR CATEGORIES OF ABUSE

Physical abuse

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a pupil such as to cause severe and adverse effects on emotional development. It may include conveying that a pupil is worthless or unloved, not giving opportunities to express views, deliberately silencing them, age or developmentally inappropriate expectations, serious bullying, seeing or hearing ill-treatment of another, or exploitation or corruption.

Sexual abuse

Sexual abuse involves forcing or enticing a pupil to take part in sexual activities, not necessarily involving violence, whether or not the pupil is aware of what is happening. It may involve physical contact, assault by penetration, non-penetrative acts, or non-contact activities such as involving pupils in looking at or producing sexual images, watching sexual activities, encouraging sexually inappropriate behaviour or grooming, including online. Sexual abuse can be perpetrated by adults or other pupils.

Neglect

Neglect is the persistent failure to meet a pupil's basic physical and/or psychological needs, likely to result in serious impairment of health or development. It may include failing to provide adequate food, clothing, shelter, protection, supervision, medical care or emotional responsiveness.

APPENDIX 6: POLICE & CRIMINAL EVIDENCE ACT 1984 - CODE C

The Headteacher, DSL and DDSLs are aware of the requirement for pupils to have an appropriate adult when in contact with police officers who suspect them of an offence.

- Anyone who appears to be under 18 must be treated as a child unless there is clear evidence that they are older.
- If an officer has reason to suspect that a person of any age may be vulnerable, that person is entitled to be accompanied by an appropriate adult.
- The DSL/DDSL will communicate any known vulnerabilities to police officers and record this on MyConcern.
- If the DSL/DDSL does not believe the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate concerns.
- A police officer must not caution a child or vulnerable person unless the appropriate adult is present. If a caution is given in the absence of the appropriate adult, it must be repeated in the appropriate adult's presence.
- The appropriate adult may be a parent, guardian, local authority representative, social worker or another responsible adult who is independent of the police.